



# FRANKLIN COUNTY BOARD OF COMMISSIONERS

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APR 27 2018

FCC Mail Room

April 24, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

RE: Market Modification Petition for Franklin County, Georgia

Dear Ms. Dortch,

Please find enclosed one (1) original and four (4) copies of each of the following Market Modification Petition for Special Relief with Respect to DISH Network and DIRECTV:

Modification of the Television Market of Station WSB-TV (ABC), Channel 2, Atlanta, Georgia Modification of the Television Market of Station WXIA (NBC), Channel 11, Atlanta, Georgia Modification of the Television Market of Station WAGA (FOX), Channel 5, Atlanta, Georgia Modification of the Television Market of Station WGCL (CBS), Channel 46, Atlanta, Georgia

I appreciate your assistance in getting these documents to the appropriate location.

If you should have any questions, please do not hesitate to contact me at <a href="mailto:bthomas@franklincountyga.gov">bthomas@franklincountyga.gov</a> or 706-384-2483.

Sincerely,

Beth Thomas
County Manager

Enclosures

CSR-8959-A Docket 18-160

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Petition of Franklin County, Georgia

For Modification of the Television Market of Station WXIA (NBC), Channel 11, Atlanta, Georgia with Respect to DISH Network and DIRECTV

To: Chief, Media Bureau

### PETITION FOR SPECIAL RELIEF

Pursuant to Section 338 of the Communications Act and Sections 76.7, 76.59 and 76.66 of the Commission's rules and with the support of hundreds of its residents, Franklin County, Georgia, hereby requests (hereinafter, the "Petition") that the television market of WXIA (Channel 11, NBC, Atlanta, Georgia) ("WXIA" or "Station") be modified to include Franklin County (the "County") in northeast Georgia with respect to satellite TV provider DISH Network ("DISH") and satellite TV provider DIRECTV ("DIRECTV"). For historical and geographic reasons, the County has long been assigned by Nielsen to the Greenville-Spartanburg-Asheville-Anderson designated market area ("DMA"). As such, the County has been "orphaned" by Nielsen due to its assignment to an out-of-state DMA and has been deprived of the ability to receive from a satellite carrier its preferred in-state television broadcast stations. Consumers in the County have been unable to receive from a satellite carrier important news from their own state capitol. Sports fans in the County have had far fewer opportunities to enjoy in-state televised sporting events such as the Atlanta Falcons football games and the record breaking inaugural season of the Atlanta United Major League Soccer team. In addition, the County's weather patterns, while influenced by the Blue Ridge mountain range, typically comes from the West. As part of the Greenville-Spartanburg-Asheville-Anderson DMA, the County is at a disadvantage for seeing the incoming weather from the other portions of our state.

The STELA Reauthorization Act of 2014 ("STELAR") empowered the Federal Communications Commission ("FCC" or "Commission") to modify a television broadcast station's local market when it would, among other things, "address satellite subscribers' inability to receive in-state programming in certain areas." STELAR added satellite television carriage to the Commission's market modification authority. The Commission adopted satellite television market modification rules that provide a process for local governments to request changes to the boundaries to include a new community located in a neighboring local market. This Petition thus falls within Section 338's market modification provision, which allows the Commission to "include additional communities within [a station's]....to better effectuate the purposes of this section."

For reasons explained below, the County respectfully requests that the Commission modify WXIA's, local market, as defined in 17 U.S.C. § 122(j), to include the County with respect to carriage by DISH and DIRECTV.

### I. TECHNICAL AND ECONOMIC FEASIBILITY

On June 27, 2016 the County sent to DISH a pre-filing coordination letter pursuant to 47 C.F.R. § 76.59(e) of the Commission's rules (Exhibit A). DISH responded on September 2, 2016 ("DISH Response") (Exhibit A) and confirmed that based upon DISH's current knowledge and satellite coverage capabilities, DISH was unaware of any factors that render the provision of the

<sup>&</sup>lt;sup>1</sup> Market Modification Order ¶ 3.

<sup>&</sup>lt;sup>2</sup> FCC DA 17-204 and Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014; MB Docket No. 15-71, Report and Order, 30 FCC Rcd 10406 (2015) (STELAR Market Modification Report and Order) (revising 47 CFR § 76.59). A community is defined as a county for purpose of the satellite market modification rules. 47 CFR § 76.5(gg)(2).

<sup>&</sup>lt;sup>3</sup> 47 U.S.C. § 338(1).

Station in the County to be "technically infeasible" pursuant to 47 C.F.R. § 76.59(e). DISH, however, reserved the right to amend its feasibility certification "at any time due to, among other things, a satellite equipment failure or a different satellite being brought into service for the area that include the County which has different coverage capabilities that the satellite(s) currently being used."

The County also understands from the DISH Response that if a given Atlanta, Georgia local broadcast station impacted by a market modification elects retransmission consent with respect to DISH for carriage of its station in the County, "DISH cannot be certain whether it will be able to successfully reach an agreement with the station." And, if DISH is unable to reach a retransmission consent agreement with a given station, "it will be impossible for DISH to provide that station's signal into the County." DISH also clarified that if only some, but not all, of the Atlanta Big-4 stations "were to deny DISH the right to retransmit its signal into the County, it may be either technically or economically infeasible, or both, for DISH to launch a customer offering with only the remaining stations that did grant retransmission consent." The DISH Response also notes that "an FCC grant of a market modification could result in, among other things, two different stations affiliated with the same broadcast network being authorized for satellite local-into-local carriage in the County," which would "result in DISH being required to pay retransmission consent fees twice for the same broadcast network." DISH therefore has stated it "must reserve the right to charge additional fees to subscribers in the County who elect to receive any Atlanta local broadcast stations that DISH may be authorized to offer as a result of any market modification."

On June 27, 2016, the County sent to DIRECTV a pre-filing coordination letter pursuant to 47 C.F.R. § 76.59(e) of the Commission's rules (Exhibit B). DIRECTV responded by letter

<sup>4</sup> Id.

August 2, 2016 ("DIRECTV Response) (Exhibit B) and confirmed that based upon DIRECTV's current knowledge and satellite coverage capabilities, DIRECTV can provide service to all the zip codes associated within the County with its SD and HD spot beam.

### II. THIS PETITION SATISFIES THE STATUTORY FACTORS

As required by STELAR, the Commission determines whether to grant a market modification based on consideration of five statutory factors. These factors reflect the four factors previously applicable to market modifications in the cable context, plus an additional factor to assess "whether modifying the local market of the television station would promote consumers' access to television broadcast station signals that originate in the State of residence." The five statutory factors are not intended to be exclusive. Furthermore, the importance of particular factors will vary depending on the circumstances of each case.

#### The five factors are:

- 1. Whether the station or other stations located in the same area have been historically carried on (a) the cable system within that community; and (b) the satellite carrier or carriers serving that community;
- 2. Whether the television station provides coverage or other local service to that community;
- 3. Whether modifying the local market of the television station would promote consumers' access to television broadcast station signals that originate in their state of residence;
- 4. Whether any other television station that is eligible to be carried by a satellite carrier in the community in fulfillment of the requirements provides news coverage

- of issues of concern to the community or provides carriage or coverage of sporting and other events of interest to the community; and
- 5. Evidence of viewing patterns in households that subscribe and do not subscribe to the services offered by multichannel video programming distributors within the areas served by the multichannel video programming distributors in the community.<sup>5</sup>

### A. This Petition Satisfied the Third and Most Important Factor by Bringing an In-State Local Broadcast Station to Consumers Who Historically Have Been Unable to Receive it From a Satellite Carrier

Where, as here, the purpose of the market modification is to bring a previously unavailable (via satellite carrier) in state-local broadcast station to a community, the third factor should carry significant weight in the Commission's analysis. Today, because the County is assigned to the Greenville-Spartanburg-Asheville-Anderson DMA, all of its local broadcast content available by satellite is oriented to the interests of different states. The Station is licensed in the Atlanta, Georgia DMA, which is in the same state as the County. As the Franklin County Commissioners, we represent our constituents and seek to be an advocate for those we serve? We have worked diligently on this petition since the implementation of STELAR. Franklin County residents feel disenfranchised and disadvantaged by the lack of access to Atlanta programming, and want to receive news, as well as educational, sports, and other programming, from our own state capitol<sup>8</sup>.

<sup>&</sup>lt;sup>5</sup> Order ¶ 8.

<sup>&</sup>lt;sup>6</sup> See Order ¶ 4 and ¶ 8.

<sup>&</sup>lt;sup>7</sup> Letter from Franklin County Board of Commissioners Chairman

<sup>&</sup>lt;sup>8</sup> See Exhibit L

This Petition therefore satisfies the third factor by delivering an in-state NBC-affiliated local broadcast station from Atlanta, the Georgia state capitol, over DISH's and DIRECTV's satellite TV service to consumers in the County who have previously been unable to receive it from DISH and DIRECTV. As the Order explains, this third in-state factor received enhanced weight when the Commission considers market modification petitions.<sup>9</sup>

This Petition is also timely, given that 2018 is a gubernatorial election year. In this, and every election year, Franklin County residents do not have access to specific public affairs programming such as televised debates of gubernatorial candidates, Congressional candidates, candidates for State office, or statewide ballot issues, which compromises their ability to be well informed and well educated as to issues affecting them as citizens of Georgia. Constituents in the County have an interest in seeing their own state officials and news regarding state political campaigns on satellite TV, and this Petition would facilitate such access.

In addition to state and national political news, the County residents desire to see local political results and programming that is important to the County. The November 2017 local election results were not posted or were provided limited coverage by the NBC-affiliated local broadcast station. Local election results are submitted by the Election Superintendent to the Georgia Secretary of State routinely throughout the election night making the information available to the stations as well as the public. As evidenced by Exhibit J which includes screenshots of election results from the station's website, results for Georgia's orphaned counties, including Franklin County's municipalities, were excluded. The current NBC-affiliated local broadcast station also provided no coverage or limited coverage of the 2018 candidates.

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<sup>&</sup>lt;sup>9</sup> See Order ¶ 4 ("We conclude that the new in-state factor, when applicable, favors any market modification that would promote consumers' access to an in-state station. When applicable, this in-state factor serves as an enhancement, the particular weight of which depends on the strength of showing by the petitioner.")

In a letter joint letter of support from our Congressional representatives, Congressman Collins, Senator Isakson, and Senator Perdue express a strong support of the satellite market modification and define the "need for access to in-state television for news, weather, and sports". They further note that "this petition comes after years of effort in the legislative and executive branches of our government as well as the state level" <sup>10</sup>

The Georgia Association of Broadcasters, a trade association that represents the interest of Georgia television licensees, has also confirmed their full support in a letter<sup>11</sup>. The Association writes, "as broadcasters in Georgia, we appreciate the efforts of Franklin [County] to increase viewer access to local broadcast TV programming in Northeast Georgia." While the Association does not wish to undermine the framework of local TV broadcasting, they do note their goal "is to provide [orphan] counties with local Georgia programming."

Grant of this Petition would enable DISH and DIRECTV subscribers in the County to receive the Station, which offers Georgia-oriented weather, news, sports, and political coverage, among other things, through their satellite TV package.

### B. The Remaining Factors Support This Petition

The first, second, and fifth factors all relate to historical or current opportunity to view the Station in the County (the first and second factors), and whether the residents of the County have availed themselves of such opportunities (the fifth factor). Since the purpose of STELAR was to facilitate access to in-state broadcast programming, neither a lack of historical carriage or coverage, nor a commensurate lack of historical viewing patterns for the Station, should weigh against the requested market modification. Because the County has long been assigned by Nielsen to an out-of-state DMA, STELAR's market modification provision marks the first

<sup>&</sup>lt;sup>10</sup> Letter dated May 19, 2017 from Congress of the United States—Collins, Isakson, Perdue

<sup>&</sup>lt;sup>11</sup> Letter dated November 27, 2017 from Georgia Association of Broadcasters

opportunity for the County to receive the Station's signal over satellite. Given this lack of carriage, residents of the County have had scant opportunity to develop any viewing patterns for the Station. It is precisely this lack of opportunity to view, via satellite TV, an in-state network-affiliated station that this Petition intends to remedy. Regarding the fourth factor, the County is unaware of another in-state local broadcast station carried by a satellite provider in the County that offers Atlanta- and Georgia-oriented news coverage of issues of concern to residents of the County.

### III.EVIDENTIARY SHOWING

The Commission adopted a standardized evidence approach for modifications and requires certain evidence be submitted. The County submits evidence as explained below responsive to the evidentiary requirements in the Commission's rules.<sup>12</sup>

- (1) A map or maps illustrating the relevant community locations and geographic features, station transmitter sites, cable system headend locations, terrain features that would affect station reception, mileage between the community and the television station transmitter site, transportation routes and any other evidence contributing to the scope of the market.
  - a. Attached as <u>Exhibit C</u> is the ASR Registration Search indicating the Station's transmitter site.
  - b. Attached as Exhibit D is a map indicating the approximate highway distance between the County and WXIA's main transmitter site in Atlanta, Georgia. As the map shows, the County is roughly 82 miles away by car from WXIA's main transmitter site in the Atlanta DMA.

<sup>12 47</sup> C.F.R. § 76.59(b)(7).

- (2) Grade B contour maps delineating the station's technical service area and showing the location of the cable system headends and communities in relation to the service areas.
  - a. Attached as Exhibit E is a summary of results illustrating the location of the County and indicating WXIA's coverage area based on aver-the-air signal strength. According to the coverage area map, the signal strength for WXIA is 75.8 miles in comparison to 62.4 miles from the Greenville NBC-affiliated local broadcast station. While the over-the-air signal strength does not impact satellite delivery, this map is evidence that assignment to the Greenville DMA is not an issue of geographical proximity to the stations. The variance in distances between the two local broadcast stations and the County is minimal.
  - b. Attached as Exhibit F is the Contour Map for WXIA. However, it is important to note that service does not stop at the contour line and over-the-air signal strength should not impact broadcast via satellite.
- (3) Available data on shopping and labor patterns in the local market.
  - a. Attached as Exhibit G is labor/shopping patterns data. Based on a survey of Northeast Georgia Orphan County residents, including Franklin County, over 91% of respondents stated they shop locally or within the state of Georgia. Over 97% of respondents seek services such as healthcare and arts/entertainment locally or within the state of Georgia.
- (4) Television station programming information derived from station logs or the local edition of the television guide.

- a. Attached as Exhibits H and I, is a recent multi-day programming lineup for WXIA, for DISH and DIRECTV, respectively, which shows that the Station broadcasts a local news program with Georgia news, sports, and weather several times a day, with "NEWS" airing at 3:00am, 3:30am, 4:00am, 4:30am, 5:00am, 5:30am, 6:00am, 11:00am, 5:00pm, 6:00pm, 11:00pm local time.
- (5) Cable system channel line-up cards or other exhibits establishing historic carriage, such as television guide listings.
  - a. There has not been historic carriage of the Station in the County by satellite carriers, and therefore no evidence is being submitted for this element with respect to satellite. The County respectfully requests a waiver from this required evidence.
- (6) Published audience data for the relevant station showing its average all day audience (i.e., the reported audience average over Sunday-Saturday, 7 a.m.-1a.m., or an equivalent time period) for both cable and noncable households or other specific audience indicia, such as station advertising and sales data or viewer contribution records.
  - a. As discussed above, given the lack of historical carriage of the station in the County, Nielsen rating or other audience data would not be helpful in evaluating this Petition. Therefore, to the extent necessary, we respectfully request a waiver of this item.

### IV. ADDITIONAL RELEVANT INFORMATION

In addition to the five statutory requirements, the Commission may also consider other pertinent information when necessary to develop a result that will "better effectuate the

purposes" of the law. Section 338 directs the commission to "afford particular attention to the value of localism."

Franklin County is nestled in Northeast Georgia at the foothills of the Blue Ridge Mountains and seated in Carnesville. We are proud of our Georgia roots and diversified landscape. Franklin County leads the state in poultry production and is consistently one of the top 3 total farm gate value counties in Georgia. We are also home to the state's largest Livestock Market. We are intersected by 22-miles of Interstate 85 which brings millions of visitors through our area each year including patrons to our two state parks. Lake Hartwell, an Army Corp of Engineers lake, separates Franklin County and South Carolina and is considered one of the Southeast's largest and most popular recreation lakes. We are also home five wonderful cities including Lavonia--the smallest city in the U.S. with an original Carnegie Library Building; Royston--the birthplace of baseball legend Ty Cobb; Franklin Springs—location of Emmanuel College a US News and World Report Top 50 Regional College; and Canon—the foundation of Peach State Pride, a company stemmed from "a love of Georgia's history, heritage, and people" and "created to spark and symbolize Georgia Pride."

Franklin County takes great pride in its Georgia history. As the eighth county in the state, Franklin County originally encompassed a large region of land including all of the territory in six and portions of seven other modern-day counties. Today, Franklin County is "orphaned". Being assigned to the Greenville-Spartanburg-Asheville-Anderson DMA, Franklin County, Georgia residents are deprived of in-state news, politics, sports, and weather. The quality and quantity of coverage by the current local broadcast station is not an issue. Instead, it is the content. The current local broadcast station is marketed to appeal to the residents of South and North Carolina, not the residents of Georgia. Franklin County is the birthplace of a company with the mission to

spark Georgia Pride. Yet, our homes are filled with branding and marketing for North and South Carolina. Exhibit J shows the current broadcasters choice of themes and captions such as "Chronicle; South Carolina from Above" which isolates the Georgia viewers assigned to the Greenville-Spartanburg-Asheville-Anderson DMA. Attached as Exhibit J is evidence of the "Carolina" themed media delivery of the current broadcaster.

Georgia has increased its capacity as a state government. Georgia has been ranked #1 for Business for five consecutive years<sup>13</sup> and is currently ranked first in production of feature film movies. Over the past few years, Northeast Georgia has been the site of many of these films. Georgia is also a major hub for transportation and worldwide travel<sup>14</sup>. Franklin County is the homeplace to the current Commissioner of Economic Development and Commissioner of the Georgia Department of Transportation. Yet, our nightly news is filled with the economic, entertainment, travel, and politic news of North and South Carolina.

In the past year, Georgia's sports teams filled the national headlines. The inaugural season of the Atlanta United Major League Soccer team broke multiple records for attendance<sup>15</sup>. This increase in soccer was evident through all levels of the sport. Director of Georgia Soccer was quoted, "the impact of Atlanta United will be huge. It will raise the level of interest in soccer by everyone, from media to corporate to civic to schools to park and rec programs." However, due to the lack of sports coverage in Franklin County, participation in soccer youth programs decreased. This is in complete contrast to the 37% average increase in participation in Georgia. In football, our residents are forced to watch the Carolina Panthers over their in-state team, the Atlanta Falcons. The University of Georgia (UGA) is a short 35-mile ride from the County seat.

from www.dirtysouthsoccer.com

<sup>&</sup>lt;sup>13</sup> Arend, M. (2017, November). Smart Money. Retrieved from www.siteselection.com

<sup>&</sup>lt;sup>14</sup>Transportation and the Economy. http://georgiainfo.galileo.usg.edu

<sup>&</sup>lt;sup>15</sup> Roberson, D. (2017, October 23). Atlanta United breaks more attendance records. Retrieved from www.ajc.com <sup>16</sup> Longshore, J. (2016, August 11). Georgia Soccer DOC Jacob Daniel: "So many signs of soccer growth". Retrieved

Due to the proximity, some of our high school students attend UGA through the dual enrollment, "Move on When Ready" (MOWR), program. Yet, during UGA's path to the National Championship game, our nightly news was filled with Clemson (South Carolina) news and sports update.

While UGA made headlines for sports, the greater subject is the opportunity for Franklin County students to attend the school through the Hope and Zell Miller Scholarship programs. These post-secondary scholarship options are made available with funding through the Georgia Lottery Program. In Franklin County, tickets are purchased in the state, but nightly broadcasts on our local stations show the South Carolina lottery.

With Georgia's growing economy and increased capacity, the race for Governor and other leadership and legislative positions in 2018 will be important. Many candidates have declared their candidacy. As election days grow closer, the paid advertisements and endorsements will increase in numbers. In the homes of satellite customers in Franklin County, these short broadcasts intended to provide information in making an education decision will be nullified. Our residents will learn of North Carolina and South Carolina candidates. Citizens desiring information on candidates seeking to represent Franklin County Georgia in the Senate and House in both the national and state government will lose access to this important information. Even beyond the commercials, this information will be absent from nightly news programs, televised debates, and election poll and results reporting.

Carriage of Atlanta television station in Franklin County is an issue of utmost importance to the citizens of our community. In that regard, attached as Exhibit L are public comments recently submitted to the Franklin County Board of Commissioners in support of this Petition.

Over the years, countless other constituents have expressed their strong desire for Atlanta television programming to the Franklin County Board of Commissioners.

Franklin County is one of the counties that has repeatedly been identified as an "orphan" county with insufficient access to in-state programming. Congress intended to address orphan county situations such as Franklin County with the implementation of STELAR. The County seeks to remedy the lack of in state programming. Since the enactment of STELAR, Franklin County has diligently worked to compile the necessary information required for the market modification. In addition, Franklin County has sought and received the support of the Georgia Association of Broadcasters, Legislators, and most importantly, our citizens. Evidence of this support is provided in Exhibits K and L.

### V. CONCLUSION

For the foregoing reasons, the County urges the Commission to expeditiously grant its Petition.

Respectfully submitted,

FRANKLIN COUNTY

**BOARD OF COMMISSIONERS** 

J. Thomas Bridges, Chairman

### LISTING OF EXHIBITS

EXHIBIT A DISH Pre-Filing Coordination letters and Feasibility Certificates
EXHIBIT B DIRECTV Pre-Filing Coordination letters and Feasibility Certificates
EXHIBIT C ASR Registration Search Results
EXHIBIT DGoogle Map showing distance between Antenna Structure and County Seat
EXHIBIT E Summary of Distance to Transmitters from All Channels
EXHIBIT FContour Map
EXHIBIT GNortheast Georgia Orphan County Citizen Survey
EXHIBIT HProgramming Lineup for DISH
EXHIBIT IProgramming Lineup for DIRECTV
EXHIBIT J Current Broadcaster Coverage of Elections and Themed Coverage
EXHIBIT KLetters of Support
EXHIBIT L Comments from County Residents



dish

Alison Minea
Director & Senior Counsel, Regulatory Affairs
(202) 463-3709

September 2, 2016

### VIA ECFS, EMAIL, AND FIRST CLASS MAIL

Franklin County Board of Commissioners P.O. Box 159 Carnesville, GA 30521 ATTN: Beth Thomas

Re: STELAR Feasibility Certification, Market Modification Pre-Filing Coordination Letter for Franklin County, GA, MB Docket No. 15-71

To the Franklin County Board of Commissioners:

DISH Network L.L.C. ("DISH") is in receipt of your pre-filing coordination letter ("Letter"), 1 pursuant to the procedures set forth in the Federal Communications Commission's ("FCC") rules governing market modifications for satellite carriers under the STELA Reauthorization Act of 2014 ("STELAR").<sup>2</sup>

The Letter, and subsequent email between the undersigned and Beth Thomas, requests information regarding carriage of the following stations in the Atlanta, Georgia market into Franklin County, Georgia: WSB (ABC); WAGA (FOX); WGCL (CBS); and WXIA (NBC).

The attached Feasibility Certification pursuant to 47 C.F.R § 76.59(e) reflects DISH's response to the Letter.

Please contact the undersigned if you have any questions.

<sup>&</sup>lt;sup>1</sup> Letter from the Beth Thomas, Franklin County Board of Commissioners to Alison Minea, DISH Network, June 27, 2016.

<sup>&</sup>lt;sup>2</sup> See Amendment to the Commission's Rules Concerning Market Modification, Implementation of Section 102 of the STELA Reauthorization Act of 2014, Report and Order, MB Docket No. 15-71, FCC 15-111, ¶ 47 (Sept. 2, 2015) ("Market Modification Order"). See also STELA Reauthorization Act of 2014 (STELAR), § 102, Pub. L. No. 113-200, 128 Stat. 2059, 2060-62 (2014) (codified at 47 U.S.C. § 338(1)).

Sincerely,

Alison Minea

Director and Senior Counsel, Regulatory

**Affairs** 

DISH Network L.L.C.

cc: Beth Thomas, bthomas@franklincountyga.com

Attachment: Feasibility Certification Pursuant to 47 C.F.R. § 76.59(e)

### FEASIBILITY CERTIFICATION PURSUANT TO 47 C.F.R § 76.59(e)

- This certification is issued by DISH Network L.L.C. ("DISH") pursuant to the pre-filing coordination procedures contained in the Federal Communications Commission's ("FCC") Order<sup>1</sup> governing market modifications for satellite carriers under the STELA Reauthorization Act of 2014 ("STELAR").<sup>2</sup>
- 2. This certification responds to the letter ("Letter") from the Franklin County Board of Commissioners requesting information regarding carriage of certain Atlanta, Georgia local broadcast stations (WSB (ABC); WAGA (FOX); WGCL (CBS); and WXIA (NBC) (the "Stations") to DISH subscribers in Franklin County, Georgia (the "County").
- 3. DISH has evaluated the Letter in light of its current satellites and spot beam configurations, and has determined that, at this time, DISH is unaware of any factors that render such carriage "technically infeasible" pursuant to 47 C.F.R. § 76.59(e). DISH, however, reserves the right to amend this Feasibility Certification at any time due to, among other things, a satellite equipment failure or a different satellite being brought into service for the area that includes the County which has different coverage capabilities than the satellite(s) currently being used. This certification is limited to the Stations listed in paragraph 2, above.
- 4. To the extent that an Atlanta, Georgia local broadcast station impacted by a market modification elects retransmission consent with respect to DISH for carriage of its station in the County, DISH cannot be certain whether it will be able to successfully reach an agreement with the station. If DISH is unable to reach a retransmission consent agreement with a given station, it will be impossible for DISH to provide that station's signal into the County. If any one of the Stations referenced in your Letter were to deny DISH the right to retransmit its signal into the County, it may be either technically or economically infeasible,<sup>3</sup> or both, for DISH to launch a customer offering with only the remaining stations that did grant retransmission consent.
- 5. As DISH noted in its comments during the development of the market modification rules, an FCC grant of a market modification could result in, among other things, two different stations affiliated with the same broadcast network being authorized for satellite local-into-local carriage in the County. This could result in DISH being required to pay retransmission consent fees twice for the same broadcast network. Therefore, we must reserve the right to charge additional fees to subscribers in the County who elect to

<sup>&</sup>lt;sup>1</sup> Amendment to the Commission's Rules Concerning Market Modification, Implementation of Section 102 of the STELA Reauthorization Act of 2014, Report and Order, MB Docket No. 15-71, FCC 15-111, ¶ 47 (Sept. 2, 2015).

<sup>&</sup>lt;sup>2</sup> STELA Reauthorization Act of 2014 (STELAR), § 102, Pub. L. No. 113-200, 128 Stat. 2059, 2060-62 (2014) (codified at 47 U.S.C. § 338(1)).

<sup>&</sup>lt;sup>3</sup> See 47 C.F.R. § 76.59(e).

<sup>&</sup>lt;sup>4</sup> Comments of DISH Network L.L.C. at 9, MB Docket No. 15-71 (May 13, 2015).

#### DISH Network L.L.C.

- receive any Atlanta, Georgia local broadcast stations that DISH may be authorized to offer as a result of any market modification.
- 6. Without the ability to offset the additional costs associated with a market modification, it would be "economically infeasible" pursuant to 47 C.F.R. § 76.59(e) for DISH to comply with a market modification ordered by the FCC consistent with the request described in the Letter.

The foregoing has been prepared using facts of which I have personal knowledge or upon information provided to me. I certify under penalty of perjury that the foregoing is true and correct to the best of my current knowledge, information, and belief.

Alison Minea

Director & Senior Counsel,

Regulatory Affairs DISH Network L.L.C.

Executed on September 2, 2016.

### FRANKLIN COUNTY BOARD OF COMMISSIONERS

J. Thomas Bridges Commission Chairman jtbridges@franklincountyga.com

Beth Thomas County Manager bthomas@franklincountyga.com

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June 27, 2016



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Ms. Alison A. Minea
Director & Senior Counsel, Regulatory Affairs
DISH Network L.L.C.
1110 Vermont Ave NW
Suite 750
Washington, DC 20005

RE: Feasibility Certificate Request for Franklin County Georgia

Dear Sir or Madam:

Franklin County, Georgia is identified as an orphan county. As part of the Greenville Spartanburg Asheville Anderson Neilson DMA Region, our citizens are unable to access Georgia news, politics, sports, and emergency information as customers of satellite providers. Our citizens have an overwhelming interest in market modification and applauded the STELAR Act of 2014 as the initial step for progress.

Franklin County, Georgia is located northeast Georgia approximately 100 miles northeast of Atlanta, 60 miles southwest of Greenville, South Carolina, and approximately 30 miles northwest of Atlanta, Georgia. The county is predominantly rural but is home to five municipalities. Franklin County boasts a dynamic composition as one of the state's largest agricultural producers, home to a large recreation population on Lake Hartwell, and host to 22 miles of Interstate-85. Franklin County is one of four Georgia orphan counties included in the Greenville Spartanburg Asheville Anderson Neilson DMA Region.

While the new FCC regulations allow for local governments to file a market modification request, it is our desire to work with our satellite operators and stations. We recognize the desire of our citizens and acknowledge it is in our best interest to have the willing participation of all parties. As such, we are reaching out to initiate the voluntary pre-filing coordination process. This letter serves as our request to obtain a feasibility certification to clarify whether or not, and to what extent, carriage is technically and economically feasible.

Our citizens desire news, sports, and programming in from their home state. We look forward to your response as Franklin County works towards achieving a successful market modification petition.

Sincerely,

Beth Thomas

County M. ւթ. 159 • Carnesville, Georgia 30521 • Phone 706-384-2483 • Fax. 706-384-7089

www.franklincountyga.gov

### FRANKLIN COUNTY BOARD OF COMMISSIONERS

J. Thomas Bridges
Commission Chairman
jtbridges@franklincountyga.com

Beth Thomas
County Manager
bthomas@franklincountyga.com

Elaine Evans
County Clerk
eevans@franklincountyga.com

June 27, 2016



Robert L. Franklin District 1 Commissioner rlamarfranklin@yahoo com

David R. Strickland
District 2 Commissioner
Districkland@ballsouth net

Jeff S. Jacques
District 3 Commissioner
Jsjacques@windstream net

Eddie Wester District 4 Commissioner ewester@franklincountyga.com

DIRECTV, LLC

Local-Into-Local – Market Modification 2260 East Imperial Highway El Segunda, California 90245 Attention: Vice President, Content & Programming

RE: Feasibility Certificate Request for Franklin County, Georgia

Dear Sir or Madam:

Franklin County, Georgia is identified as an orphan county. As part of the Greenville Spartanburg Asheville Anderson Neilson DMA Region, our citizens are unable to access Georgia news, politics, sports, and emergency information as customers of satellite providers. Our citizens have an overwhelming interest in market modification and applauded the STELAR Act of 2014 as the initial step for progress.

Franklin County, Georgia is located northeast Georgia approximately 100 miles northeast of Atlanta, 60 miles southwest of Greenville, South Carolina, and approximately 30 miles northwest of Athens, Georgia. The county is predominantly rural but is home to five municipalities. Franklin County boasts a dynamic composition as one of the state's largest agricultural producers, home to a large recreation population on Lake Hartwell, and host to 22 miles of Interstate-85. Franklin County is one of four Georgia orphan counties included in the Greenville Spartanburg Asheville Anderson Neilson DMA Region.

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Sincerely,

Beth Thomas

County Manager

P.O. Box 159 • Carnesville, Georgia 30521 • Phone: 706-384-2483 • Fax: 706-384-7089 www.franklincountyga.gov



August 2, 2016

Via E-mail and US Mail

Beth Thomas
County Manager
Franklin County
PO Box 159
Carnesville, GA 30521
bthomas@franklincountyga.com

Dear Ms. Thomas:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for stations WSB, WXIA, WAGA, and WGCL in Franklin County, GA.

DIRECTV's engineering staff was given the areas to evaluate for our Denver, CO spot beams, and have found that:

• DIRECTV's spot beams cover all current zip codes in Franklin County

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

**DIRECTV** 

1 My name	e is _Phil G	oswitz		SVD of Engin			
		or determining	service areas f	SVP of Engin for television s	stations carried	on DIRECTV	at DIRECTV. As 's spot beams.
2. DIRECTV station indic	has reviewe cated.	d the request to	o add the com	munities liste	d below to the	local televisi	on market for the
St	ation	State	County				
W	SB	GA	FRANKLIN	로 등록 (19학교 : 기, 19 <u>5</u> 기, 195	(1985년 - 1944년 - 1945년 - 1944년 - 1947년 - 1947년 - 1947년 - 194		
against spec a. 1 b. E c. E d. 1	ric performa The measure Estimated at Estimated lev The amount	l, with respect to ince criteria. The diperformance mospheric effect rels of interfere of capacity curre ailability figure	ne following fa of the spot be cts for reception nce. ently used, an	actors have be eam covering to on of the signand and reasonably	en included in this Television al. expected to be	this analysis: Station's loca	el market.
a. S b. C	ce in the zip ignal availab Ilear sky sign	code(s) in ques ility.	tion:	ng metrics, wl	hich it has used	d to evaluate	the potential to
5. DIRECTV h parameters u	as conducte sed to deter	d this analysis i mine the geogr	n substantially aphic area in v	the same ma	nner and using	g substantiall ions carried c	y the same on the spot beam.
OH□ O □H□ C	SD Canp Cannother SD Cannother SD Cannof ST Cannof the signal of	DIRECTV: provide service of provide servides not meet to provide servides not meet to codes not meet to codes is atta	ice to any zip the minimum p ice to some zip the minimum	code associat performance t p codes assoc	ed with this re hresholds for lated with this	equest becaus DIRECTV's ser request beca	rvice. Juse reception
* IMPORTAI	NT: SD cove from service	rage will no lon	ger be availab	ole after 2018/	'2019 when th	e existing MP	PEG 2 satellite is
declare unde	r penalty of	perjury that the	e foregoing is t	true and corre	ect.		
executed on _	8-1-16 Date						

	ame is Ph			SVP of Engineering	at DIRECTV. As an on DIRECTV's spot beams.
	CTV has revi				e local television market for the
	Station	State	County		
	WXIA	GA	FRANKLIN		
against s	pecific perfo a. The mea b. Estimate c. Estimate d. The amo	ormance critering sured performated atmospherical levels of interport of capacity	<ul> <li>The following fance of the spot be effects for recept ference.</li> <li>currently used, a</li> </ul>	actors have been included in leam covering this Television	n Station's local market.  De used, on the spot beam.
provide s	ervice in the a. Signal av b. Clear sky	e zip code(s) in	question:	ring metrics, which it has use	ed to evaluate the potential to
5. DIREC	TV has cond ers used to d	lucted this anal determine the g	ysis in substantial geographic area in	ly the same manner and using which it currently offers sta	ng substantially the same ations carried on the spot beam.
5	HD ☑SD HD □SD of the sig HD □SD of the si	Cannot provide gnal does not m Cannot provide	e service to any zi neet the minimum e service to some z neet the minimum		request because reception
	RTANT: SD ved from se		io longer be availa	able after 2018/2019 when t	the existing MPEG 2 satellite is
l declare ι	ınder penal	ty of perjury th	at the foregoing is	s true and correct.	
Executed	on <u>8-1-</u>	Date			

1. My n such, l a	ame is Phi m responsib	il Goswitz le for determ	I am nining service areas f	SVP of Engineer or television station	ing	at DIRECTV. As
			uest to add the comi			
	Station	State	County	7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		]
	WAGA	GA	FRANKLIN	eraumania umbasa sab damasa sab		
4. From the provide see	a. The meas b. Estimated c. Estimated d. The amou e. The target his analysis, ervice in the c. Signal avai	ured perform l atmospheric levels of inte nt of capacity availability f DIRECTV has zip code(s) in lability.	y currently used, and igure used for all tele derived the followin question:	am covering this Te n of the signal. I reasonably expect evision stations offe	luded in this analysi levision Station's lo ted to be used, on the ered on the spot be	is: cal market. he spot beam. am.
c. 5. DIRECT\	Total carri  / has conduc	ignal margin. er-to- interfe cted this anal termine the g	rence ratio. ysis in substantially t geographic area in w	the same manner a hich it currently off	nd using substantia ers stations carried	lly the same on the spot beam.
6. Based o. ☑ □I	n this analys HD ☑SD Ca HD □SD Ca of the signa HD □SD Ca of the signa	is, DIRECTV: n provide ser nnot provide al does not m nnot provide	rvice to all the zip conservice to any zip conservice to any zip conservice the minimum perservice to some zip	des associated with ode associated with erformance thresho	n this request.* In this request becau olds for DIRECTV's se	ise reception ervice.
* IMPORT remove	ANT: SD co	verage will no ice.	o longer be available	after 2018/2019 w	hen the existing M	PEG 2 satellite is
declare und executed on ignature	8-1-16	_	at the foregoing is tru	ue and correct.		

1. My nar	ne is Phil Goswitz	I amS	VP of Engineering	at DIRECTV. As
such. I am	responsible for determining	g service areas for	r television stations carried	on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WGCL	GA	FRANKLIN

- 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
  - a. The measured performance of the spot beam covering this Television Station's local market.
  - b. Estimated atmospheric effects for reception of the signal.
  - c. Estimated levels of interference.
  - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
  - e. The target availability figure used for all television stations offered on the spot beam.
- 4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
  - a. Signal availability.
  - b. Clear sky signal margin.
  - c. Total carrier-to-interference ratio.
- 5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
- 6. Based on this analysis, DIRECTV:

☑HD ☑SD Can provide service to all the zip codes associated with this request.\*

- ☐ HD ☐ SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐ HD ☐ SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.\* The list of unserved zip codes is attached.
- \* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Evacutad on

8-1-16

Signature

### Registration 1020431

### Map Registration

**Registration Detail** 

Reg Number

1020431

Status

Constructed

File Number

A0971610

Constructed

01/01/1981

EMI

No

Dismantled

**NEPA** 

No

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long

33-45-24.0 N 084-19-55.0 W

Address

110 ARIZONA AVE

City, State

ATLANTA, GA

Zip

30307

County

**DEKALB** 

Center of AM Array

Position of

Tower in Array

**Heights (meters)** 

Elevation of Site Above Mean Sea Level

Overall Height Above Ground (AGL)

306.9

317.6

Overall Height Above Mean Sea Level

Overall Height Above Ground w/o

**Appurtenances** 

624.5

284.0

**Painting and Lighting Specifications** 

FCC Paragraphs 1, 3, 7, 16, 21

**FAA Notification** 

FAA Study

FAA Issue Date

**Owner & Contact Information** 

FRN

0024376113

Owner Entity

Limited Liability Company

Туре

Assignor FRN

0003477940

Assignor ID

L00016128

**Owner** 

Pacific and Southern, LLC

Gannett Co Inc

7950 Jones Branch Dr

P: (703)854-6899

E: lcarducc@gannett.com

McLean, VA 22107

Contact

Attention To: Linda Carducci

Gannett Co Inc

7950 Jones Branch Dr McLean , VA 22107 P: (703)854-6899

F:

E: lcarducc@gannett.com

Last Action Status

Status

Constructed

Received

05/19/2015

Purpose

Change Owner

Entered

05/19/2015

Mode

Interactive

### **Related Applications**

05/19/2015

A0971610 - Change Owner (OC)

06/24/2011

A0730898 - Admin Update (AU)

03/21/2007

A0544446 - Change Owner (OC)

Related applications (6)

#### Comments

#### **Comments**

None

#### History

Date

**Event** 

05/20/2015

Registration Printed

05/20/2015

Change of Ownership Letter Sent

05/19/2015

Change of Ownership Received

All History (13)

#### **Automated Letters**

05/20/2015

Authorization, Reference

05/20/2015

Ownership Change, Reference 863340

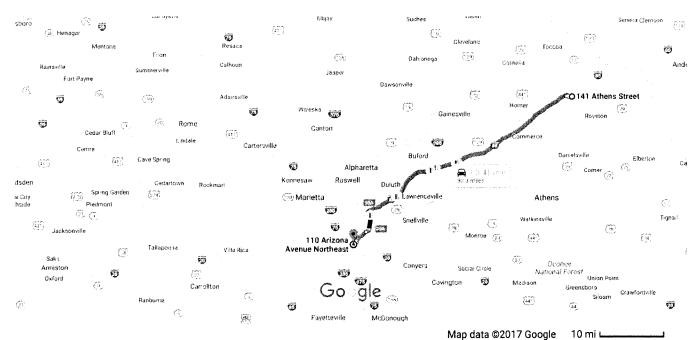
06/25/2011

Authorization, Reference

All letters (7)

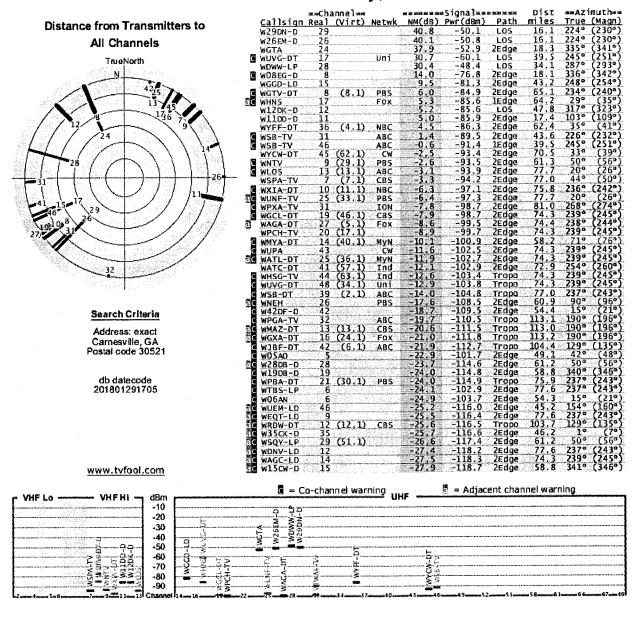
CLOSE WINDOW

### Google Maps 141 Athens St, Carnesville, GA 30521 Drive 82.3 miles, 1 h 41 min to 110 Arizona Avenue Northeast, Atlanta, GA



via I-85 S 1 h 41 min
Fastest route, despite slowdown on I-285 causing 19-min delay 82.3 miles

# Distance from Transmitters to Franklin County, GA



#### **Summary of Results**

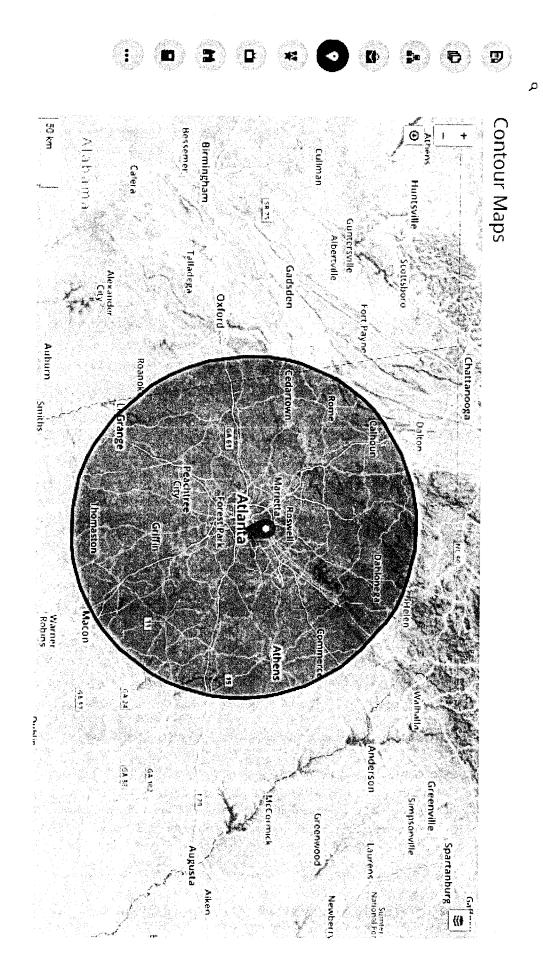
Affiliate	Current B	roadcaster	Requested B	roadcaster
	Call Sign	<u>Distance</u>	<u>Call Sign</u>	<u>Distance</u>
ABC	WLOS	77.7	WSB-TV	43.6 / 39.5
CBS	WSPA	77.0	WGCL	74.3
FOX	WHNS	64.2	WAGA	74.4
NBC	WYFF	62.4	WXIA	75.8

# WXIA-TV ATLANTA, GA

Virtual Channel 11 RF Channel 10 Facility ID 51163

STATE OF THE STATE





## Franklin County Board of Commissioners Northeast Georgia Orphan County -- Citizen Survey

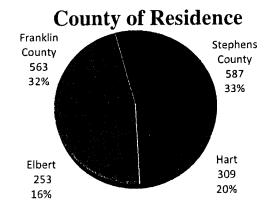
### **Survey Information**

Survey Conducted by Survey Monkey Results as of May 15, 2017 Joint Effort by all NEGA Orphan Counties

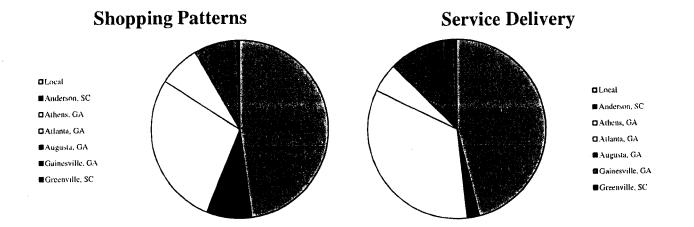
Total Respondents: 1,769

\*note some questions skipped by participants

Number of Questions: 8



	Yes	No	Maybe
Would you be interested in receiving in-state television broadcast (Atlanta stations)?	94.70%	5.30%	n/a
Would you be willing to pay more for in-state television broadcast?	18.80%	43.00%	38.30%
What is the main reason you are interested in switching to in-state television broadcasts?	Sports		2.00%
Transfer to the man remove years are a second or a	News		14.70%
	<b>Politics</b>		1.90%
	All of the	Above	81.40%
			South
	Local	Georgia	Carolina
Where do you typically shop?	47.90%	43.30%	8.80%
Where do you typically seek services such as healthcare, arts/entertainment, car repair, etc?	46.00%	51.20%	2.80%



	Sunday Apr, 22	Monday Apr, 23	Tuesday Apr, 24	
12 AM	Saturday Night Live (HD, Repeat, Comedy, 1/13/2018, TV-14)	American Ninja Warrior Orlando Qualifying (Hour 2)	The Tonight Show Starring Jimmy Fallon (HD, New, Interview, 4/23/2018, TV	
12:30 AM		( <b>HD</b> , Sports, 6/22/2015, TV-PG)	14) Late Night with Seth Meyers (HD, New, Interview, 4/23/2018, T)	
1 AM	Your Move with Andy Stanley (Information, TV-G)	Paid Program (TV-G)	14)	
1:30 AM	Atlanta Tech Edge (Sports, TV-PG)	Paid Program (TV-G)	Last Call with Carson Daly (New, Entertainment, 4/23/2018,	
2 AM	LX.TV: 1st Look Alternative Fitness	Meet the Press (HD, Repeat, News, 4/22/2018)	Extra (HD, New, Entertainment,	
2:30 AM	Paid Program (TV-G)		NBC Nightly News with Lester	
3 AM	Paid Program (TV-G)	Early Today (New, News, TV-G)	11 Alive News Tonight (Repeat, News)	
3:30 AM	Paid Program (TV-G)	Early Today (New, News, TV-G)	(Coposi, Com)	
4 AM	Open House NYC Presents George to the Rescue:	Early Today (New, News, TV-G)	Early Today (New, News, TV-G)	
4:30 AM	Open House NYC Presents George to the Rescue:	11 Alive's Wake Up with Chesley (New, News)	11 Alive's Wake Up with Chesle (New, News)	
5 AM	On the Money (New, News, 4/20/2018, TV-G)	Morning Rush (New, News)	Morning Rush (New, News)	
5:30 AM	Paid Program (TV-G)	Morning Rush (New, News)	Morning Rush (New, News)	
6 AM	Paid Program (TV-G)	Morning Rush (New, News)	Morning Rush (New, News)	
6:30 AM	In Touch with Dr. Charles Stanley Planning Without God	, , ,	, ,	
7 AM	(Repeat, Řeligious, TV-G)	<b>Today</b> (HD, New, News, 4/23/2018, TV-G)	Today (HD, New, News, 4/24/2018, TV-0	
7:30 AM	Turning Point with Dr. David Jeremiah			
8 AM	Sunday TODAY with Willie Geist (HD, New, News, 4/22/2018)			
8:30 AM				
9 AM	11 Alive Weekend Mornings (New, News)	Megyn Kelly TODAY (HD, New, News, 4/23/2018)	Megyn Kelly TODAY (HD, New, News, 4/24/2018)	
9:30 AM		,		
10 AM	Meet the Press (HD, New, News, 4/22/2018)	Today with Kathie Lee & Hoda (HD, New, News, 4/23/2018)	Today with Kathie Lee & Hoda (HD, New, News, 4/24/2018)	
10:30 AM				
11 AM	Atlanta Business Chronicle's Biz (Interview)	Atlanta & Company (New, Information)	Atlanta & Company (New, Information)	
11:30 AM	Atlanta Tech Edge (Sports, TV-PG)			
12 PM	Paid Program (TV-G)	·		
12:30 PM	On the Money (New, News, 4/20/2018, TV-G)	The List (HD, Entertainment)	The List (HD, Entertainment)	
	Paid Program	Days of Our Lives (New, Drama, 4/23/2018, TV-14)	Days of Our Lives (New, Drama, 4/24/2018, TV-14	
1 PM	(TV-G)	(New, Diama, 4/25/2010, 10-14)	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
1 PM 1:30 PM	(TV-G)	(New, Diama, 4/23/2010, 19-14)	( , <u> </u>	
	(TV-G)	Daily Blast Live (HD, Entertainment)	Daily Blast Live (HD, Entertainment)	

2 0 4	2018 NHL Stanley Cup Playoffs	Dr. Phil	Dr. Phil
3 PM 3:30 PM	Eastern Conference First Round, Game 6: Pittsburgh Penguins at Philadelphia Flyers from Wells	Our Daughter is Starving Herself to Death and It's Killing Our Family (HD, New, Interview, 4/23/2018, TV-	Our Daughter's Starving Herself to Death; Can Jordan Be Saved? (HD, New, Interview, 4/24/2018, TV-
4 PM	Fargo Center (Sports, 4/22/2018)	The Ellen DeGeneres Show (HD, New, Interview, 4/23/2018, TV-	The Ellen DeGeneres Show (HD, New, Interview, 4/24/2018, TV-
4:30 PM		G)	G)
5 PM		11Alive @ Five (New, News)	11Alive @ Five (New, News)
5:30 PM			
6 PM	11 Alive Weekend News @ 6pm (New, News)	11 Alive News @ 6pm (New, News)	11 Alive News @ 6pm (New, News)
6:30 PM	NBC Nightly News with Lester Holt	NBC Nightly News with Lester Holt	NBC Nightly News with Lester Holt
7 PM	Dateline NBC Silent No More	Wheel of Fortune Best Friends	Wheel of Fortune Best Friends
7:30 PM	(HD, New, True, 4/22/2018, TV-PG)	Jeopardy! (HD, New, Game/Quiz, 4/23/2018,	Jeopardy! (HD, New, Game/Quiz, 4/24/2018,
8 PM	Little Big Shots Too Many Chefs	The Voice Live Top 12 Performances	The Voice Live Top 12 Eliminations
8:30 PM	(HD, New, True, 4/22/2018, TV-G)	( <b>HD</b> , New, True, 4/23/2018, TV-PG)	(HD, New, True, 4/24/2018, TV-PG)
9 PM	Genius Junior Craniums and Brainiums		Rise This Will God Willing Get Better
9:30 PM	( <b>HD</b> , New, Game/Quiz, 4/22/2018, TV-G)		( <b>HD</b> , New, Drama, 4/24/2018, TV- 14)
10 PM	Timeless The King of the Delta Blues	Good Girls Summer of the Shark	Chicago Med The Parent Trap
10:30 PM	( <b>HD</b> , New, Sci-Fi, 4/22/2018, TV- PG)	( <b>HD</b> , New, Drama, 4/23/2018, TV- 14)	( <b>HD</b> , New, Drama, 4/24/2018, TV- 14)
11 PM	The Late Feed (New, News)	The Late Feed (New, News)	The Late Feed (New, News)
11:30 PM	Sports Extra (Sports)	The Tonight Show Starring Jimmy Fallon (HD, New Interview 4/23/2018, TV)	The Tonight Show Starring Jimmy Fallon (HD New Comedy 4/24/2018 TV-

	Sunday Apr, 22	Monday Apr, 23	Tuesday Apr, 24
12 AM	Saturday Night Live (HD, Repeat, Comedy, 1/13/2018, TV-14)	American Ninja Warrior Orlando Qualifying (Hour 2)	The Tonight Show Starring Jimmy Fallon (HD, New, Interview, 4/23/2018, To
12:30 AM		( <b>HD</b> , Sports, 6/22/2015, TV-PG)	14).  Late Night with Seth Meyers (HD, New, Interview, 4/23/2018, T
1 AM	Your Move with Andy Stanley (Information, TV-G)	Paid Program (TV-G)	14)
1:30 AM	Atlanta Tech Edge (Sports, TV-PG)	Paid Program (TV-G)	Last Call with Carson Daly (New, Entertainment, 4/23/2018,
2 AM	LX.TV: 1st Look Alternative Fitness	Meet the Press (HD, Repeat, News, 4/22/2018)	Extra (HD, New, Entertainment,
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3 AM	Paid Program (TV-G)	Early Today (New, News, TV-G)	11 Alive News Tonight (Repeat, News)
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4 AM	Open House NYC Presents George to the Rescue:	Early Today (New, News, TV-G)	Early Today (New, News, TV-G)
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6 AM	Paid Program (TV-G)	Morning Rush (New, News)	Morning Rush (New, News)
6:30 AM	In Touch with Dr. Charles Stanley Planning Without God		
7 AM	(Repeat, Řeligious, TV-G)	Today (HD, New, News, 4/23/2018, TV-G)	Today (HD, New, News, 4/24/2018, TV-0
7:30 AM	Turning Point with Dr. David Jeremiah		
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8:30 AM			,
9 AM	11 Alive Weekend Mornings (New, News)	Megyn Kelly TODAY (HD, New, News, 4/23/2018)	Megyn Kelly TODAY (HD, New, News, 4/24/2018)
9:30 AM			
10 AM	Meet the Press (HD, New, News, 4/22/2018)	Today with Kathie Lee & Hoda (HD, New, News, 4/23/2018)	Today with Kathie Lee & Hoda (HD, New, News, 4/24/2018)
10:30 AM			
11 AM	Atlanta Business Chronicle's Biz (Interview)	Atlanta & Company (New, Information)	Atlanta & Company (New, Information)
11:30 AM	Atlanta Tech Edge (Sports, TV-PG)		
12 PM	Paid Program (TV-G)		
12:30 PM	On the Money (New, News, 4/20/2018, TV-G)	The List (HD, Entertainment)	The List (HD, Entertainment)
1 PM	Paid Program (TV-G)	Days of Our Lives (New, Drama, 4/23/2018, TV-14)	Days of Our Lives (New, Drama, 4/24/2018, TV-14
1:30 PM	Impractical Jokers HellCopter		
2 PM	Paid Program (TV-G)	Daily Blast Live (HD, Entertainment)	Daily Blast Live (HD, Entertainment)
2:30 PM	Impractical Jokers Stripped of Dignity	Daily Blast Live (HD, Entertainment)	Daily Blast Live (HD, Entertainment)

EXHIBIT I: Programming Lineup for DIRECTV

			l p. pru		
3 PM	2018 NHL Stanley Cup Playoffs Eastern Conference First Round,	<b>Dr. Phil</b> Our Daughter is Starving Herself to	Dr. Phil Our Daughter's Starving Herself to Death; Can Jordan Be Saved? (HD, New, Interview, 4/24/2018, TV-		
3:30 PM	Game 6: Pittsburgh Penguins at Philadelphia Flyers from Wells	Death and It's Killing Our Family (HD, New, Interview, 4/23/2018, TV-			
4 PM	Fargo Center (Sports, 4/22/2018)	The Ellen DeGeneres Show (HD, New, Interview, 4/23/2018, TV-	The Ellen DeGeneres Show (HD, New, Interview, 4/24/2018, TV-		
4:30 PM		G)	G)		
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6 PM	11 Alive Weekend News @ 6pm (New, News)	11 Alive News @ 6pm (New, News)	11 Alive News @ 6pm (New, News)		
6:30 PM	NBC Nightly News with Lester Holt	NBC Nightly News with Lester Holt	NBC Nightly News with Lester Holt		
7 PM	Dateline NBC Silent No More	Wheel of Fortune Best Friends	Wheel of Fortune Best Friends		
7:30 PM	(HD, New, True, 4/22/2018, TV-PG)	Jeopardy! (HD, New, Game/Quiz, 4/23/2018,	Jeopardy! (HD, New, Game/Quiz, 4/24/2018,		
8 PM	Little Big Shots Too Many Chefs	The Voice Live Top 12 Performances	The Voice Live Top 12 Eliminations (HD, New, True, 4/24/2018, TV-PG)		
8:30 PM	(HD, New, True, 4/22/2018, TV-G)	(HD, New, True, 4/23/2018, TV-PG)			
9 PM	Genius Junior Craniums and Brainiums		Rise This Will God Willing Get Better		
9:30 PM	( <b>HD</b> , New, Game/Quiz, 4/22/2018, TV-G)		( <b>HD</b> , New, Drama, 4/24/2018, TV- 14)		
10 PM	Timeless The King of the Delta Blues	Good Girls Summer of the Shark	Chicago Med The Parent Trap		
10:30 PM	(HD, New, Sci-Fi, 4/22/2018, TV- PG)	( <b>HD</b> , New, Drama, 4/23/2018, TV- 14)	( <b>HD</b> , New, Drama, 4/24/2018, TV- 14)		
11 PM	The Late Feed (New, News)	The Late Feed (New, News)	The Late Feed (New, News)		
11:30 PM	Sports Extra (Sports)	The Tonight Show Starring Jimmy Fallon	The Tonight Show Starring Jimmy Fallon		
I	Make the state of the first of the property of the state of the sta	(HD New Interview 4/23/2018 TV-	(HD New Comedy 4/24/2018 TV-		

Watch on Demand

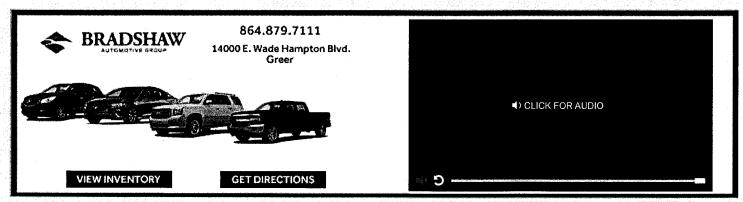


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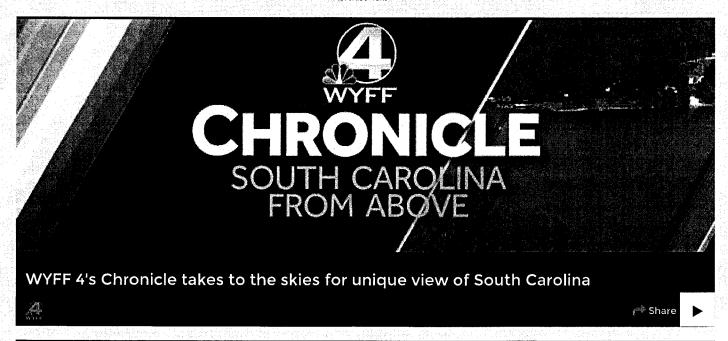




SEVERE WEATHER: There is currently 1 active weather alert



Advertisement



ICYMI: WYFF 4 Chronicle focuses on impact of drug addiction

WYFF 4

ICYMI: Chronicle: The Cost of Freedom

WYFF 4

ICYMI: Watch the WYFF News 4 Chronicle: The Giving Season

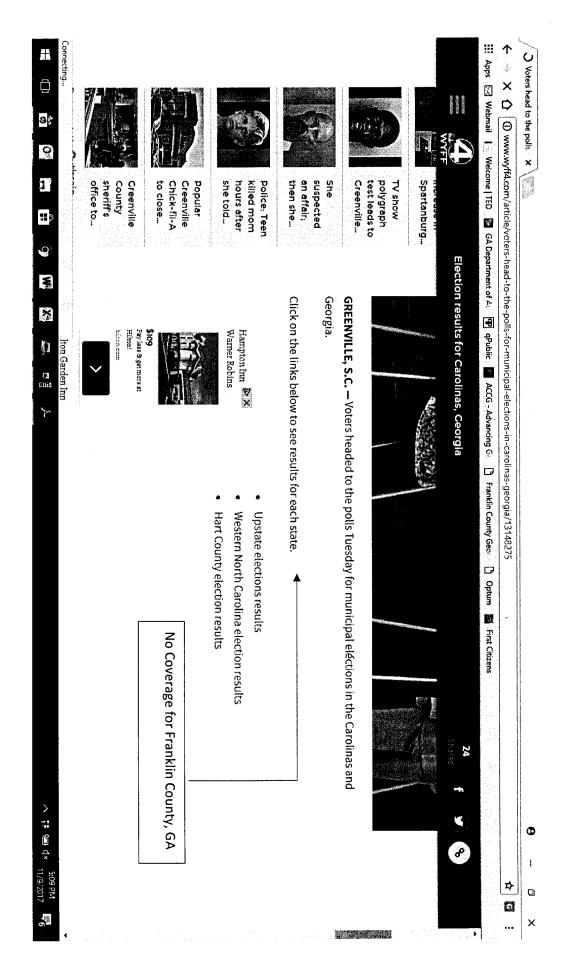
WYFF 4

WYFF News 4's Quarterly News Magazine

WYFF 4

Chronicle: The Giving Season Part 4

WYFF 4





# FRANKLIN COUNTY BOARD OF COMMISSIONERS

"You Are Why We Are Here"

June 12, 2017

The Honorable Ajit V. Pai Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20536

Dear Chairman Pai:

Franklin County is nestled in Northeast Georgia at the foothills of the Blue Ridge Mountains and seated in Carnesville. We are proud of our Georgia roots and diversified landscape. Franklin County leads the state in poultry production and is consistently one of the top 3 total farm gate value counties in Georgia. We are also home to the state's largest Livestock Market. We are intersected by 22-miles of Interstate 85 which brings millions of visitors through our area each year including patrons to our two state parks. Lake Hartwell, an Army Corp of Engineers lake, separates Franklin County and South Carolina and is considered one of the Southeast's largest and most popular recreation lakes. We are also home five wonderful cities including Lavonia--the smallest city in the U.S. with an original Carnegie Library Building; Royston--the birthplace of baseball legend Ty Cobb; Franklin Springs—location of Emmanuel College a US News and World Report Top 50 Regional College; and Canon—the foundation of Peach State Pride, a company stemmed from "a love of Georgia's history, heritage, and people" and "created to spark and symbolize Georgia Pride."

Yet Franklin County is not considered a part of any Georgia demographic market area. Instead, we are considered an "orphan county". Despite an overwhelming desire to be included in Georgia's broadcasting territory, our citizens must rely on South Carolina and North Carolina broadcasters to deliver the day's news, weather, and sports information. In addition, we are deprived of important in-state political material. In a recent survey, over 94% of our respondents expressed interest in receiving in-state satellite broadcast service, and over 97% of our respondents stated they seek services such as healthcare and entertainment in Georgia. Citizens' letters, emails, and calls on the subject pour into our offices and this subject is a frequent topic with our constituents.

The Satellite Television Extension and Localism Act Reauthorization (STELAR) Act of 2014 opened the doors for local governments to petition on behalf of our citizens for market modification. As the local governing body, we seek to be an advocate for those we serve. We are appreciative of the opportunity and pleased that the Commission set forth this process. We have reached out to our representatives, the satellite companies, and the broadcasters to facilitate a successful outcome. We now present our case to the Federal Communication Commission and implore you consider our petition.

Thank you for your consideration,

J. Thomas Bridges, Chairman

Franklin County Board of Commissioners

## Congress of the United States Washington, DC 20515

May 19, 2017

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20536

Dear Chairman Pai,

We write in strong support of the satellite market modification petitions submitted by Franklin, Hart, Stephens, and Elbert counties (the "counties"), seeking coverage of in-state broadcasting from Atlanta-based stations. These petitions are the culmination of years of work by the counties in support of their residents' need for access to in-state television programming for news, weather, and sports. A recent survey found that over 94% of respondents are interested in receiving in-state television broadcasting, highlighting the importance of this issue among county residents.

Residents of these four northeast Georgia counties who subscribe to satellite television currently receive only local programming from broadcasting stations in the Asheville, North Carolina and Greenville, South Carolina media markets. As a result, residents are deprived of the range of critical information that in-state broadcasters provide to their communities. Since weather patterns in this region generally move from west to east, residents depend on public safety messages that come through in-state broadcasters. Thus, the provision of local broadcasting options represents a matter of public safety as well as an important cultural and economic link between these counties and the rest of Georgia.

This petition comes after years of effort in the legislative and executive branches of our government as well as at the state level. Members of Georgia's congressional delegation worked together with colleagues and stakeholders to develop a viable solution that was ultimately included the Satellite Television Extension and Localism Reauthorization (STELAR) Act of 2014. The Commission's promulgation of final rulemaking in September of 2015 and the issuance of the first market modification orders in early 2017, pursuant to the STELAR Act, gives us hope that the residents of the counties in northeast Georgia will finally have access to the local broadcasting that they so urgently want and need.

We urge the Commission to diligently review the petitions of Franklin, Hart, Stephens, and Elbert counties and work with all affected stakeholders to quickly complete consideration of their satellite market modification petitions. Thank you for your consideration.

Sincerely,

Doug Collins U.S. Congress

Johnny Jsakson U.S. Senate

David Perdue U.S. Senate



November 27, 2017

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20536

Dear Chairman Pai,

The Georgia Association of Broadcasters (GAB) is the trade association that represents the interests of Georgia's over-the-air radio and television licensees who reach more than 95% of Georgia's population every week. Our membership is comprised of more than 500 radio and television broadcasters and covers all 159 counties in the state.

As broadcasters in Georgia, we appreciate the efforts of Elbert, Hart, Franklin and Stephens counties (hereafter the "orphan counties") to increase viewer access to local broadcast TV programming in Northeast Georgia. With this letter, we want to confirm our support for increasing localism in a manner that does not undermine the designated market area system.

In discussing carriage of television signals, it is important to remember that the designated market area (DMA) system serves as the foundation that allows local stations to support service to their communities. The FCC report on DMAs, released on June 3, 2016, affirmed the DMA structure and determined that departing from the existing DMA system would create enormous disruptions in the video programming industry. This report also referred to an option for increasing localism that has been previously addressed – voluntary agreements for pay-TV operators to carry in-state stations' local, non-duplicative programming. Broadcasters in the past have offered this option to pay-TV providers in several different markets.

Our goal is to provide those counties with local Georgia programming, while not undermining the framework of our nation's local TV broadcasting system. To the extent that this can be achieved through targeted market modification, we fully support the orphan counties' petition. Additionally, the GAB continues to support efforts to negotiate terms of targeted carriage arrangements to allow delivery of local, in-state, non-duplicative broadcast programming and to increase access to in-state news by Georgia viewers.

We look forward to working with all parties in furtherance of an outcome that brings more local programming to viewers in the orphan counties. In doing so, we also need to respect existing programming contracts and important FCC rules that support locally-oriented TV broadcasting. The specifics of such negotiated carriage arrangements will need to be worked through with individual broadcast stations.

Again, we thank you for your continued desire to work with us to facilitate a successful outcome.

Sincerely,

Bob Houghton President

1 resident

Rn Hought

Georgia Association of Broadcasters



## EXHIBIT L

## Comments from Citizens

## Emails and Letters

Note: Mailed letters are typed in summary format for ease of reading

From:

Frances Johnson < feslingerjohnson@hotmail.com>

Sent:

Wednesday, March 15, 2017 1:50 PM

To:

comments@franklincountyga.com

Subject:

Switch from SC TV market to Atlanta market

We have lived in Georgia all of our 75 years. We would like to get our news from the state in which we live.

Please consider switching from the Greenville SC TV market to Atlanta!!!

It would be nice to live out our "twilight" years listening to GEORGIA news. Thanks very much.

From:

Diane Moss < diane.moss@crmleaders.org >

Sent:

Wednesday, March 15, 2017 11:07 AM

To:

comments@franklincountyga.com

Subject:

**Orphan Counties** 

I have been calling Senators and Representatives for several years now trying to get Ga. Stations. Our weather has already passed us by the time I see it on TV channels and I know nothing about our political candidates or issues in Ga. If I lived 5 miles east I would need in Madison County and would have the GA stations.

I've even said I'm willing to pay a little more to have both of necessary.

Please help this get changed!

diane moss

(sent from my phone excuse any typos)

text 0

I don't think it makes sense to have the sc tv stations, give us the Atlanta stations for news and especially weather!!

FROM: 6784102940@mms.att.net

From:

Carolyne Caudell <carolyne@windstream.net>

Sent: To: Tuesday, March 07, 2017 12:11 AM comments@franklincountyga.com

Subject:

Atlanta Channels

My name is Hugh Caudell, and I live in northern Franklin County.

As Georgia residents, I feel we should access to Atlanta television stations for news, weather, sports and political news. We are citizens of Georgia – no interest in SC news. Franklin County has remained an "orphan County" too long!

I am a heart patient, and travel to Emory in Atlanta. Traffic and weather updates are very beneficial to us during frequent trips.

My wife utilizes medical providers in Gainesville – who have referred her to Emory.

Political news, updates on proposed bills with results, accidents on I-85 and other roadways, weather forecasts relative to inclement weather & the forecast for potential storm impacts.

We frequently shop in Buford, Gainesville, and Atlanta. Also, the sports news is essential year round.

Are there any other "Orphan Counties" who rely on Alabama, North Carolina, & Florida for their State news?

In summary, we are Georgia Citizens & need Atlanta television channels.

Thank you for your efforts to secure State news for Franklin County.

From:

vgoss56 <vgoss56@bellsouth.net> Thursday, March 09, 2017 10:59 AM

Sent: To:

comments@franklincountyga.com

Subject:

TV market switch

Yes, finally! I moved from Gwinnett along with lots of others and my family members moved too. We are interested in the reports of traffic and happenings in DeKalb and Gwinnett as we still have family there. Also, my sister in law and brother in law drive daily to work at their jobs. So please offer the Atlanta channels to Franklin county even if there is a price involved. There are a lot of people from Gwinnett area here and moving here and they must commute back and forth to work.. It's good to know about the interstate and situations as traveling to destinations.

Thanks for considering the change up. As I know nothing about South Carolina except a trip now and then to Seneca and Anderson for shopping or eating out.

Thanks again,

Vickie Goss

Franklin County resident

From:

Lisa < lbryant61@windstream.net >

Sent:

Thursday, March 09, 2017 11:31 AM

To:

comments@franklincountyga.com

Subject:

TV switch to Atlanta

I would like to put in my vote/request to have our satellite stations switched from Greenville South Carolina to Atlanta Georgia, or at least the option to.

I'm a Franklin County citizens and currently have satellite through DIRECTV. I shop in Commerce and the Atlanta area. Our doctors are in Gainesville. We go to sporting events and entertaining events in Atlanta. We also vote in Georgia and prefer to see campaign ads strictly for our candidates and not candidates of our neighboring states.

This is something that has concerned us since we moved here over 20 years ago. I find it irritating to be forced to have Greenville South Carolina stations and not be given the option to have stations in the state in which we live in! Thank you for your time and for taking the time to read my comments.

Lisa Bryant

Lisa B.

#### **Beth Thomas**

From:

bruce <bscranton@bellsouth.net>

Sent:

Thursday, March 09, 2017 12:52 PM comments@franklincountyga.com

To: Subject:

TV Market Switch Comments

Dear Sirs,

I strongly support changing the TV market to Atlanta.

I believe that this should be done at no additional cost.

I think that it is just plain wrong, and a violation of the principles of an informed electorate, that we do not get news on what is happening in our state capitol. We do not get political advertising on elections that we can vote on, we must endure political advertising from people that we do not know and cannot vote for. Depriving us of news an insight into what is happening in our state and our state capitol is heavy handed and not right. It should be corrected.

Also, the sports, advertising, and news from Georgia is far more interesting and important to me.

3-454

**Bruce Scranton** 

From:

judy\_bill@windstream.net

Sent: To: Wednesday, March 15, 2017 7:27 PM comments@franklincountyga.com

Subject:

Atlanta TV market

Franklin County Board of Commissioners - FCC Petition

I REQUEST A CHANGE TO GEORGIA TV STATIONS.

I RECEIVE NO NEWS FROM GEORGIA--NO WEATHER FROM GEORGIA--

IN TIMES PAST, I HAVE WRITTEN LOCAL TV STATIONS, NC & SC TV STATIONS REQUESTING MY COVERAGE COME FROM THE GA AREA.

I HAVE WRITTEN TO THE FCC AS A PERSONAL PETITION TO HAVE GA STATIONS.

THANK YOU TO COMMISSIONERS & U.S. REP COLLINS FOR ASSISTANCE IN SECURING LOCAL COVERAGE.

I CAN OBTAIN INTERNET SERVICE ALL OVER THE WORLD BUT CANNOT SEE A TV STATION FROM MY STATE CAPITOL.

Sincerely, Judy Ayers - Franklin County Georgia resident

#### **Beth Thomas**

From:

Ihmacm@windstream.net

Sent:

Thursday, March 09, 2017 2:21 PM

To:

comments@franklincountyga.com

Subject:

Local TV Stations

My wife and I support the change in local coverage on Dish Network to Atlanta stations. We have been Dish customers since moving to a new house and losing Cable TV which gave us Atlanta channels. We should be able to see what is happening in the state where we live.

Logan and Andrea Mathis

From:

John Human < johnhuman 1941@gmail.com>

Sent: To: Thursday, March 09, 2017 1:49 PM COMMENTS@franklincountyga.com

Subject:

Atlanta Market TV for Franklin County

I tried to take the survey at survey monkey and was not able to find same.

I would like to add my 2 cents regarding the Atlanta TV Market instead of the tv stations in North and South Carolina. I do not have anything against those markets, but, I would like to be aware of what is happening in my home state, GEORGIA..

Please add my name as a protest to this crap.

Thank U..

John U. Human 121 Waterwood Place Lavonia, GA

#### **Beth Thomas**

From:

Michael Kitchens <mikekitch42@gmail.com>

Sent: To:

Thursday, March 09, 2017 3:18 PM comments@franklincountyga.com

Subject:

TV Market Switch - I support switching to the Atlanta Stations

TV Market Switch - I support switching to the Atlanta Stations.

Best Wishes,

Mike Kitchens 552 Normandy Trail Lavonia, GA 30553

From:

Acman07 <acman07@aol.com>

Sent:

Thursday, March 09, 2017 3:37 PM

To:

comments@franklincountyga.com

Subject:

Atlanta TV Stations

I have lived in Georgia 70 of my 72 years and had Atlanta Stations until I moved to Franklin County and was shocked I could not get Atlanta TV.Please do what you can to get Atlanta stations.

Thomas E. Burks 245 Rue Saint Joan Lavonia, GA. 30553

From:

Genie Burks < nana7149@aol.com >

Sent:

Thursday, March 09, 2017 3:43 PM

To:

comments@franklincountyga.com

Subject:

Atlanta TV Stations

I would really like to get Atlanta TV, I don't need South Carolina news. Please do what is necessary to get the orphan situation changed.

Eugenia Burks

From:

queenieherren <queenieherren@bellsouth.net>

Sent: To: Thursday, March 09, 2017 6:36 PM comments@franklincountyga.com

Subject:

**FCCMARKETMOD** 

Please get our county GA stations. It is unfair to make us have South Carolina, we want information about GA.

Thanks for your help!!

Debbie Herren

From:

Wilson, Lee <LWilson@Balfourbeattyus.com>

Sent: To: Thursday, March 09, 2017 7:32 PM comments@franklincountyga.com

Subject:

TV market switch

My work takes me to Atlanta often. News there is more pertinent to me. I would like the local news from my satellite to be my choice.

Thank you for the opportunity to express my family's opinion.

Sent from my iPad

text 1489108889279

I am looking forward to having the Atlanta news stations.

FROM: 17703303627@mms.cricketwireless.net

From:

Malcolm Herndon < MHERNDON@ec.edu >

Sent:

Thursday, March 09, 2017 8:25 PM

To:

comments@franklincountyga.com

Cc:

Malcolm Herndon

Subject:

TV Market Switch

I very much want to switch my local stations from TV stations in South Carolina and North Carolina to Atlanta and Georgia, because the weather and all the news is more appropriate to my area. I live in Franklin County, city of Franklin Springs, GA, and I am a retired college professor. Thank you! Malcolm Herndon

From:

Kisskensass@aol.com

Sent:

Thursday, March 09, 2017 8:29 PM

To:

comments@franklincountyga.com

Subject:

(no subject)

I have contracted you awhile back about the cable tv. I would love to see the news from my state & not one I don't live in. It would be great if you can get news & anything else you can do for us.

Thank You. Fran Burkitt 184 Brookwood Dr Lavonia, Ga. 30553

From:

Sherry Pitts <sherrypitts@yahoo.com>

Sent:

Thursday, March 09, 2017 8:29 PM comments@franklincountyga.com

To: Subject:

TV Market Switch

Yes, I would like Franklin County to be able to access Georgia TV channels!

NOT South Carolina, NOT North Carolina. I live in Franklin County, Georgia, not those other states. Please let me see, hear, and read news about Georgia. I could not care less about what's going on in Anderson SC or Asheville NC.

I find if truly difficult to know what's going on in our state government especially during election years. It's like going to the polls, wearing a blind fold and playing pin the tail on the donkey with the ballot.

Sherry Pitts

P.S. I couldn't get the surveymonkey link, said page unavailable

From:

NAUGHTYFRAN@aol.com

Sent: To:

Thursday, March 09, 2017 8:40 PM comments@franklincountyga.com

Subject:

(no subject)

Am witting to you about the cable tv thing. We live in Ga. & have not seen any news or anything that has to do with Ga. I moved here 8 1/2 years ago from Pa. & never heard anything like this cable from another state. We would love to have our own news & shows. So anything you can do would be great.

Thank You Ken Burkitt 184 Brookwood Dr. Lavonia, Ga. 30553

From:

Ted Johnson <tedatfence@yahoo.com>

Sent: To: Thursday, March 09, 2017 9:20 PM comments@franklincountyga.com

Subject:

Television service

I prefer to receive Atlanta GA television stations. Thank you. Ted Johnson Franklin county

Sent from my iPad

From:

crchilds < crchilds@yahoo.com>

Sent:

Thursday, March 09, 2017 9:51 PM

To:

comments@franklincountyga.com

Cc:

crchilds@windstream.net

Subject:

Fcc Petition

My family and I would really enjoy the opportunity to receive coverage from the state about the state which we live in . Thanks .

Clauli Citi

Charlie Childs

From:

Richard and Martha Davis <car27jr@windstream.net>

Sent: To: Thursday, March 09, 2017 10:29 PM comments@franklincountyga.com

Subject:

Atlanta broadcasting

However this situation came about, it is ridiculus to think that 4 Georgia counties in our area cannot receive news about our own state elections, state needs, educational needs, etc.!

We get no Georgia printed news since the AJC stopped distributing to our area, and so rely on a SC newspaper which may be 20 pages in total, which 6 to 8 are advertising, and devote no coverage to any Georgia issues.

Every chance to allow us to be informed, up to date, and fully advised as to what is going on in OUR state should be paramount for the people in our area to be allowed to make informed decisions on all Georgia issues when going to the polls, so we can make sensible choices that reflect our choices in both local and State issues.

This situation must be corrected to allow us access to Georgia news that effects us every day.

Richard Davis

Lavonia, Ga.

From: capsuleforyou@windstream.net
Sent: Thursday, March 09, 2017 10:01 PM
comments@franklincountyga.com
Subject: Georgia TV Station (Atlanta Locals)

To whom it may concern:

My wife and I built our retirement home in Franklin County approx 10 years. We had a house in the metro Atlanta area and were able to maintain the local stations until we sold our house (rented it out) approx 1 year ago. That's when I notified Dish, we no longer had a mailing address in Atlanta. It did not take Disk 10 minutes to remove the local station and took a few days to get the ones out of S.C.

Since we reside in Georgia, we should be allowed to get the local station out of Atlanta. I went around and around with Disk but no avail. They would not even let us pay extra for the local's.

Why do I want to get news out of S.C.?

Sincerely,

Aldon Farmer 446 River Drive Carnesville, Ga 30521

From:

Paul Palmer < whitedawg08@gmail.com>

Sent:

Friday, March 10, 2017 8:02 AM

To:

comments@franklincountyga.com

Subject:

atlanta tv market

The Atlanta stations need to install transponders in North Georgia so people can receive the stations without cable providers.

paul

From:

Deborah Johnson <dmddrd@windstream.net>

Sent:

Friday, March 10, 2017 4:13 PM

To:

comments@franklincountyga.com

Subject:

Televesion survey

I place my vote to switch to the Atlanta stations. Debra Donaldson

Sent from my iPad

From:

Milton Bellamy <symbellamy@windstream.net>

Sent:

Friday, March 10, 2017 11:26 AM

To:

comments@franklincountyga.com

Subject:

Comments on TV Market Switch

We moved to Franklin County eleven years ago from Atlanta where we lived for 39 years. Of course, living in Atlanta we had Atlanta television stations. We were extremely disappointed and frustrated that we were not eligible for the Atlanta stations on our Dish Network in Franklin County. One and a half miles west of our residence individuals have the Atlanta stations. Every attempt to receive Atlanta stations failed. The only method available to us was the use of an outside antenna. This was impractical due to being on the fringe broadcast signal. Several attempts at antenna reception failed to provide any coverage from the Atlanta stations. We were forced to view Carolina stations for news, weather, political information and sports. The local information provided from these stations was for Carolina, not for northeast Georgia; therefore, we received no televised coverage of Georgia political processes which were very important to us. The majority of the weather forecast is Carolina weather not Georgia weather. This is true of all of the broadcasting from the Carolinas. No Georgia advertisements were broadcast on these Carolina stations. We do not shop in any of the Carolinas.

The time to remedy this problem for affected northeast Georgia residents is well past due. The only true remedy is that the affected counties in northeast Georgia be granted access to local Atlanta stations. Since Congress addressed this problem for the citizens in the four counties of Georgia two or three years ago we are perplexed that it is still an ongoing issue.

On our behalf we request that the authorities in charge swiftly proceed with this TV market switch.

Thank you.

Milton Bellamy 13384 Old Federal Road Carnesville, GA 30521

From:

Carolyn York <stalynfarm@hotmail.com>

Sent:

Friday, March 10, 2017 4:55 PM

To:

comments@franklincountyga.com

I have complained for years about having to watch South Carolina news and being left out completely other than what is in the local newspaper. I could hear Nikki Haley give her state of the state address but not Governor Deal. That is totally WRONG. I pay taxes in Georgia. I have a right to know who and how my tax money is being spent. I want to know what is going on in my state. I don't think it's asking too much to have that benefit. I know it's a simple thing to have it if you lie about your address to Dish or Direct TV. We shouldn't have to do that. It's time that these counties are not left out any more. It's time to make it right.

Sincerely, Steve and Carolyn York

From:

William Black <wrodneyblack@gmail.com>

Sent: To: Friday, March 10, 2017 6:34 PM comments@franklincountyga.com

Subject:

FCC petition

I am sixty one years old. I love my state and enjoy public television. Shows like Georgia traveler, Georgia outdoors and many others. I like to know what's going on in my state and know what the weather is going to be for the coming day! But it is rediculous to me that all I can get on my tv is South Carolina and North Carolina information and news and programming! I pay taxes in Georgia not north and South Carolina. When I go to the mall I go to Gwinnett not Anderson! I am grateful to Doug Collins for what he is doing. I hope this Tv market can be changed soon! It's about time this situation is changed!

From:

Bellsouth <teresasears@bellsouth.net>

Sent:

Friday, March 10, 2017 7:18 PM

To: Subject: comments@franklincountyga.com

Switch from Greenville, SC TV market to Atlanta

Would like to comment in the affirmative to switch to the Atlanta TV local service. Hive 4 miles south of Carnesville on Hwy 106. I am not interested in SC news.

Thanks,

Teresa Sears

From:

francesosborne@windstream.net Friday, March 10, 2017 8:27 PM

Sent: To:

comments@franklincountyga.com

Subject:

survey tv change

I AM ALL FOR A TV CHANGE TO ATLANTA STATIONS I AM SO TIRED OF WATCHING SOUTH CAROLINA AND NORTH CAROLINA NEWS CAN NOT WAIT FOR ATLANTA STATIONS!!! THANKS SO MUCH FRANCES OSBORNE 2625 COLE ROAD CARNESVILLE, GEORGIA 30521 706-384-2564

From:

mrmrsgr@yahoo.com

Sent:

Saturday, March 11, 2017 8:22 AM

To:

comments@franklincountyga.com

Whe would like to have georgia. Based news and weather. Than south Carolina Sent from my LG Mobile

From:

Barbara Dowell <dowellb@icloud.com>

Sent:

Saturday, March 11, 2017 9:11 AM

To:

comments@franklincountyga.com

Subject:

Switch to Atlanta tv

It would be wonderful to be able to watch our own state news and weather. North and South Carolina are very nice states but we have no interest in their state news or weather. The only way we can ever find out what is going on in our own state is when one of our children call from Woodstock, ga or canton, ga or Atlanta, ga and let us know. It is so great when we visit them to be able to see our own state news. Please do all you can do to fix this horrible situation. It would be fantastic to watch our own weather reports and storm warnings. We have to watch South Carolina's warnings and hope we will know if something is coming our way. Please help!!!!

Mr & Mrs Carl W. Dowell Toccoa, Ga.

From:

Claudia Kay <815claudia@gmail.com>

Sent: To: Saturday, March 11, 2017 10:28 AM comments@franklincountyga.com

Subject:

Atlanta TV Market

There is no benefit to me to be part of the Greenville/Asheville TV market. I live in GA and want GA news. I want to know what is happening in my state and do not watch any SC news. It makes no sense not to be part of the Atlanta TV market where we can receive information that is relevant to our lives.

Thank you -

Claudia Kay Canon, GA

From:

June Jones <djones1166@yahoo.com>

Sent:

Saturday, March 11, 2017 9:02 PM

To:

comments@franklincountyga.com

Subject:

Atlanta stations

We live only a mile from Madison County but can't get Atlanta stations. It's crazy. We want Georgia stations so we'll know what is going on in GA.

June and Doug Jones

From:

Judy Clay <jclay.mbc@gmail.com>

Sent:

Saturday, March 11, 2017 9:50 PM

To:

comments@franklincountyga.com

Subject:

Atlanta channels

We are tired of being orphans! Please give us Atlanta channels. I don't shop in the Carolina's, I don't worry about the weather, my family members don't live there. I love to visit there but give me my state news / weather/ sports from here In Georgia. They don't even give us the local high school sports. It does not even help me with traffic! Please give us Atlanta Channels.

From:

David Sewell <1386@windstream.net>

Sent: To:

Saturday, March 11, 2017 10:41 PM comments@franklincountyga.com

Subject:

orphan counties

Please, get us back in Georgia where we belong!!

Thank you.

David Sewell Lavonia

From:

Charles W Martin < cwmartin@windstream.net >

Sent: To:

Sunday, March 12, 2017 1:38 AM comments@franklincountyga.com

Subject:

T.V. Market Switch

We need the Atlanta Market on Franklin County Satellite providers. We don't waste our time on S.C. news and weather. We need Atlanta weather to give us a warning before storms approach us, not after they have already passed us. We need news that affects GA not S.C. We never shop in Greenville and should not have to watch their commercials. At the present time we watch FOX News so we really don't get any local news on T.V. The sooner we get Atlanta stations the better. Please hurry this up if possible.

Thank You,

Wayne and Connie Martin

From:

martys13@windstream.net

Sent:

Sunday, March 12, 2017 9:30 AM

To:

comments @ franklin county ga. com

Subject:

atlanta tv stations

we travel to gwinnett county six times a week for work, the ability to have atlanta news would add a great deal of help with our trip each morning, weather and road closures would be nice to know. we have no interest in what goes on in north and south carolina. thank you for trying to make this happen, as big as this state is one would think you could watch to stations in your own state.

From:

Thelma Pritchett < thelmapritchett@yahoo.com>

Sent:

Sunday, March 12, 2017 12:46 PM

To:

comments@franklincountyga.com

Subject:

thelmapritchett@yahoo.com

We would like to have the Atlanta TV stations Thelma David Henry and Kevin Pritchett thank you

From:

Neal Old <neal.old545@gmail.com>

Sent: To: Monday, March 13, 2017 12:01 PM comments@franklincountyga.com

Subject:

FCC

I support the petition to bring Franklin Cty. into the Atlanta viewing market.

Neal Old

From:

jmrsallen@windstream.net

Sent: To:

Monday, March 13, 2017 12:12 PM comments@franklincountyga.com

Subject:

TV Market Switch

I read in the paper your efforts to switch satellite TV customers in Franklin County from the Greenville, SC market to the Atlanta, GA market. Please include my family in your count of those desiring to make that switch. We are citizens of the State of Georgia and should receive as our primary news source stations from the Atlanta/NE Georgia area. We are denied information about our state from elections to commerce because we are forced to take SC and NC stations. These stations to not provide us with adequate information about events, issues, etc. taking place in NE Georgia.

Please do all in your power to make this switch happen.

Joe, Melanie, Robert and Stephanie Allen 469 Crump Mill Road Martin, GA 30557

From:

Sally Old <sally.old123@gmail.com>

Sent: To: Monday, March 13, 2017 12:14 PM comments@franklincountyga.com

Subject:

FCC

I support the petition to bring Franklin Cty. into the Atlanta viewing market.

From:

Patricia Hlavac <hlavacshlanding@yahoo.com>

Sent:

Monday, March 13, 2017 12:20 PM comments@franklincountyga.com

To: Subject:

switch survey

I was unable to access the "survey monkey" site so chose to email my view/concerns.

We are in the gumlog area of the county and receive our cable through TruVista (formerly Carnesville Gumlog Cable TV) and are fine with that.

We moved here from the Atlanta area in 1996 and have always enjoyed the SC channels for 2 reasons:

- 1. The Atlanta stations don't get our weather right as we in NE GA share weather related more to the SC upstate than Atlanta. Can't tell you how many times we were woken up at 4-5 a.m. by our daughter checking on us as Atlanta station weather reports were saying we were to receive snow/inclement weather. I finally had to tell her to stop calling us so early as our weather patterns come from over the mountains and we seldom experience the severe weather predicted by the Atlanta weather people.
- 2. And...If something newsworthy occurs in our area, do you see Atlanta stations up here covering it? NO you see the SC news people.

And besides, we can view 2 of the Atlanta channels as well as SC and NC. We like our news coverage.

Thanks for the opportunity to voice my opinion,

Patricia Hlavac

From:

Terry & Cheryl Payne <cntpayne66@gmail.com>

Sent: To: Monday, March 13, 2017 4:56 PM comments@franklincountyga.com

Subject:

TV Market

We moved from Metro Atlanta and are very disappointed with the news coverage we receive. We know nothing of Georgia elections or who is running for office in Georgia. We had to watch over and over election in SC and NC with all the run offs this past year. We relocated to north Georgia not SC. Many people give false addresses to get Georgia stations, but this is not honest and we do not want to do this. We do not have cable in the area we live in and us antenna because we are not going to pay for SC and NC station. Our channels are very limited and would very much like to get Ga stations but don't want to pay more to receive when those being dishonest are not.

Terry & Cheryl Payne

From:

stmartin1@windstream.net

Sent:

Monday, March 13, 2017 7:09 PM

To:

comments@franklincountyga.com

Subject:

Potential switch from Greenville SC tv market to Atlanta

Please make the switch to the Atlanta market happen. As a Georgia resident I deserve access to a Georgia based television market.

Thanks

From:

Ann Martin <annmartin\_12@yahoo.com>

Sent: To: Monday, March 13, 2017 7:46 PM comments@franklincountyga.com

Subject:

Atlanta TV Market

Hello,

I am a resident of Franklin County, GA., and I want to switch to the Atlanta TV Market. I deserve to be able to get Atlanta news and weather since I am a resident of Georgia. Please work to switch me to the Atlanta TV market.

Thank you, Ann Martin

From:

rmartin807@windstream.net

Sent: To: Monday, March 13, 2017 9:04 PM comments@franklincountyga.com

Subject:

give us atlanta teleision market access

I wish to express my desire to view Atlanta tv stations. As a Georgia resident I am much more interested in Georgia news than Carolina programing.

#### Richard Martin

From:

Linda Murphy Anderson <anderson1953@bellsouth.net>

Sent: To: Thursday, March 16, 2017 12:04 PM comments@franklincountyga.com

Subject:

Switch me to the Atlanta TV stations

I was born in Atlanta. I am 63 and have lived in Georgia 90% of my life. The 10% out of state was due to the military.

I live in Georgia. I have worked in Georgia. I had my children in Georgia and reared them in Georgia. I shop in Georgia. I conduct all my business in Georgia. I pay taxes in Georgia. I vote in Georgia. My ancestors were from Georgia.

I do not go into South Carolina for anything. Please allow me to get my news, weather, tv stations and political information from my own home state of Georgia.

Georgia is on my mind.

From:

Judy Ann Smith < judyanne\_smith@yahoo.com>

Sent:

Friday, March 17, 2017 2:04 PM

To:

comments@franklincountyga.com

Subject:

tv survey

we would like to get Ga. news and not SC news we call very often to complain.

Thanks

Farl and Judy Smith

From:

Shannon E <rarenebula@gmail.com>

Sent: To: Friday, March 17, 2017 12:16 AM comments@franklincountyga.com

Subject:

Fcc Market Atlanta TV stations.

#### Hello,

I live in Carnesville (Franklin County) and I currently can only pick up TV stations like NBC, CBS, ABC and Fox from Greenville, SC and Asheville, NC. I cannot pick up any TV stations from Atlanta with my outdoor TV antenna on my roof top. I would definitely prefer to watch local TV stations from Atlanta that are in my own state instead of watching TV and news from South Carolina and North Carolina. I hope that this change is made so that I can pick up and watch Atlanta stations with my Antenna instead of out of state channels. Also, I think that Atlanta stations should boost their TV signals in order for my outdoor antenna to pick up those stations. I have a Huge Antenna and it only picks up signals from SC and NC. So, my preference is to watch Atlanta stations so I hope this will happen soon! Also, I heard there is a TV station in Athens and I can't even pick up that station so please add Athens stations to this list. It's WUGA or something like that Channel 32 Sincerely,

Shannon

From:

Maurice Maher <maurymaher@gmail.com>

Sent:

Saturday, March 18, 2017 10:52 AM comments@franklincountyga.com

To: Subject:

Atlanta TV Stations

I have just been informed that we are considered an "orphan" county re being able to receive Atlanta TV stations in Franklin County.

Our permanent residence is in Athens, Clarke County GA and when we are at our Lake Home we like to receive the Atlanta Stations.

Is there a way in which Franklin County can receive the Atlanta Stations through our Cable Network.

Thanks in advance.

Maurice Maher 561 Rue Cezzan Lavonia, GA 30553

From:

jwsims1@windstream.net

Sent: To: Thursday, March 30, 2017 7:18 PM comments@franklincountyga.com

Subject:

TV market change

Yés, Yes, Yes !!! Please change to Atlanta TV market. We don't care about SC politics, etc. Need information on Georgia, not SC.

Thanks.

From:

Janet Varner < janetgvarner@gmail.com>

Sent:

Sunday, March 19, 2017 12:05 PM comments@franklincountyga.com

To: Subject:

FCC Regulations on the Orphan Counties TV Market

I live on a farm in Franklin County, Ga., not South Carolina. I do all my shopping in Georgia, not South Carolina. I vote in Franklin County, Georgia, not South Carolina. I vote in Franklin County, Georgia, not South Carolina. Living on a working farm in Franklin County, Georgia, not South Carolina, I need the TV stations in Georgia in order to get beef and crop prices, the weather stations for our area when we need to plow and plant, or bale hay. In order to be an informed voter, I need the Georgia stations to find out who is running for what office and their platforms. I will not get this information from the South Carolina stations.

The FCC, by not allowing us to be in the TV market in Georgia, is putting every person in our county at a terrible disadvantage.

I will appreciate all the help you can give us in getting the FCC to give us the TV market in Georgia - NOT SOUTH CAROLINA!

Sincerely,

Janet G. Varner

From:

Rhonda Contreras <rcontrer@bellsouth.net>

Sent: To: Tuesday, April 04, 2017 3:47 PM comments@franklincountyga.com

Subject:

TV stations

We have been asking our satellite TV providers (Dish, and now DirectTV) for Atlanta news stations for years, and have been told repeatedly that it is physically impossible for us to get Atlanta stations because of the nature of the satellite signal. We know this to be untrue, because we know several people who live well outside our area and into other states who get Atlanta stations, because of the location of their billing address.

We feel cut off from news in our resident state, we don't know who is running for state offices, we can't get our weather or traffic, and are quite frankly tired of being treated as though we didn't live here. Or worse, that we just don't matter. The weather we get from SC and NC is not relevant to us, and actually puts our lives in jeopardy. If there are severe storms headed our way, we don't know it.

Please do whatever you can to get these "service" providers to include us in the activities of our own state.

Thanks,

Rhonda Contreras 2307 Åthens Road Royston, GA 30662

From:

The MOSS SMITH Household < redbarnest@bellsouth.net>

Sent: To: Tuesday, March 21, 2017 4:49 PM comments@franklincountyga.com

Subject:

FCC Petition Orphan Counties

I have lived in this area for 20+ years after having lived in Atlanta for 40 years. I would love to be able to have the Atlanta stations back again, as I would have access to news, weather and political information that I currently do not have. I would be willing to pay a little more even to be able to have both, if it is an issue of having to receive the S.C. stations. Even on our closest weather news the announcer stands right in front of our section of GA as he shows the coming weather for S.C.

I have voted for both Representatives and Senators who are fighting for this issue and will continue to cast my votes this way - and that's ONLY if I read it in our local newspaper!

Thank you, Rachel Moss Smith

From:

The MOSS SMITH Household <redbarnest@bellsouth.net>

Sent:

Tuesday, March 21, 2017 4:49 PM

To: Subject:

comments@franklincountyga.com FCC Petition Orphan Counties

I have lived in this area for 20+ years after having lived in Atlanta for 40 years. I would love to be able to have the Atlanta stations back again, as I would have access to news, weather and political information that I currently do not have. I would be willing to pay a little more even to be able to have both, if it is an issue of having to receive the S.C. stations. Even on our closest weather news the announcer stands right in front of our section of GA as he shows the coming weather for S.C.

I have voted for both Representatives and Senators who are fighting for this issue and will continue to cast my votes this way - and that's ONLY if I read it in our local newspaper!

Thank you, Rachel Moss Smith

## Atlanta TV Market Letters FCC Petition

## I REQUEST YOUR ASSISTANCE IN OBTAINING TV COVERAGE FROM THE ATLANTA GEORGIA MARKET.

I have previously written to the FCC and was told that I must obtain permission to be released from the NC and SC TV stations coverage area.

I then wrote to each of the TV stations and was told I was assigned to their advertising market.

I live in Franklin County, Georgia. I cannot learn of Georgia politics, weather, disasters, events or sports. I do not know any of the politicians who govern our state. I do not have any news from our state. We can no longer receive Atlanta newspapers in our mail box nor can we buy an Atlanta paper in our home town.

I have access to the internet that reaches out into the world. How can I be denied a TV station in my own state! If you prefer, allow us to choose GA, NC, SC, and any other state of choice as our TV station. That would be much more fair. Sincerely,

Judy Ayers

## We have been interested in getting the Atlanta channels since they were pulled several years ago.

Being in the SC and NC markets gives us little news about Georgia.

We are interested in our state and what goes on at the state level.

All we know about GA Government is Nathan Deal is governor; Alan Powell, John Wilkinson and Mr. Collins represent us.

The weather forecast is another concern. As you know most weather systems and storms come from the west, so we get them some 80 miles before they get to Greenville.

We pray the Atlanta stations are returned to us. If not, is it feasible we could choose which market we prefer?

Ms. Thomas, thank you for the effort you have put forth in this matter and also to all who have had a hand in this.

Sincerely,

Frank (Sonny) and Juanita Gipson

In regard to the matter of television channels in NE GA, we live in Franklin Co. and we <u>do no</u>t want our television transferred to Atlanta. We live closer to S. Carolina and can get weather and news closer to home instead of 100 miles away. We care nothing about what is going on in the Atlanta area; that's why we moved into this area from Atlanta.

Please leave our television stations as they are. Jerry and Dorothy Klein

## Dear Commissioners,

My name is Pauline Martin and I would like to request to get Atlanta channels on my TV, please! I no longer watch any news on my TV because I don't care what goes on in South Carolina.

Yours truly, Pauline Martin

## To: Franklin County Commissioners,

Thank you very much for trying to get the Atlanta channels. We would love to have them. "Keep trying" We don't live in South Carolina.

Hinton and Sue Porter

## Dear Commissioners,

Atlanta Channels Please! My name is Cindy Jackson and me and my family are requesting a switch from South Carolina to Atlanta TV market. We don't care to know what goes on in South Carolina!

Thank you, Cindy Jackson

## Franklin County Board of Commissioners,

This is to confirm we would like to switch from Greenville, SC TV market to Atlanta.

Gay L. Elliot K. Chlebek

#### Dear Commissioners:

Oh, to feel like I belong to Georgia; and that Georgia belongs to me. Mostly I feel like a South Carolinian. I certainly know more about that state than I do about my own. I want very much to be able to get Georgia news. To know what's going on with my own government.

I thank you for your effort in regard to this matter.

Sincerely, LuAnn Reiff

## Franklin County Board of Commission

I'm writing to ask for your help with a longstanding issue that I've contacted DISH about before: the refusal of Dish Network LLC to provide those of us in my area with Atlanta local stations. In previous communications the representatives of your company have claimed that they cannot provide subscribers in my area with Atlanta local stations because they are "required by federal law" to provide programming based on my "Designated Market Area".

This is ridiculous, and I'm not alone in thinking so: every DISH subscriber that I've talked to in my area is fed up with this situation. I am a citizen of the state of Georgia, and I have every right to be informed regarding news, politics, and weather of my state, and get Georgia Public Television. And yet Dish insists that I have to consume South Carolina programming, which is of no interest to me. The news I get is not related to my interests as a citizen of Georgia, and the weather carried by South Carolina stations is literally old news: by the time they're talking about it in Greenville, we've already been hit here in Hart County.

I'm not a lawmaker, or a television programmer, but there ought to be a way for those of us on the edge of market areas to choose which DMA we want to belong to.

I'm not asking for **both** SC and GA stations, I just want to be able to choose between Atlanta and Greenville. I hope you can help.
Sincerely,
Joyce C. Hilliard

Please let us have the local Atlanta TV channels. We <u>do not</u> live in South Carolina. We <u>do not</u> vote in South Carolina and we <u>do not</u> pay our taxes in South Carolina.

Millard & Judy Mize 70 Cromer's Bridge Lane Royston, GA 30662

Clifford Mize 1219 Cromer's Bridge Lane Royston, GA 30662

Jesse & Lily Mize 5221 Sandy Cross Rd Carnesville, GA 30521

#### Dear Sir:

RE: Franklin County receiving TV stations from South Carolina and North Carolina.

- 1. I can tell who to vote for in those states. Georgia, I have to guess when I vote.
- 2. Our weather is changing, it's getting more dangerous every year. South Carolina and North Carolina broadcasts weather at South Carolina state line. By that time a tornado, high winds, heavy rains, hail or other dangers have passed, "We have been hit." Now we become "news and history." Atlanta has some of the best equipment and weather people. I know, I have lived in metro Atlanta. Now that channel 4 is off the air we get very little weather on South Carolina's "upstate" from Asheville, North Carolina. Asheville, North Carolina is high mountains. We are the hills sections. The weather is very different.
- 3. All merchandise sales news is from South Carolina and North Carolina. Why should I go to Asheville, North Carolina to buy when I can go to North Georgia? Please consider our TV viewina.

Roy & Shirley Brookshire Carnesville, GA 30521

## Gentlemen:

Since moving back to Franklin County seven years ago and leaving the city comfort of cable television, we have no real broadcast option but satellite service (DirectTV).

While doing our due diligence, we quickly learned all of our news, election/political coverage, weather, emergency information and public broadcast would come through stations in Greenville and Spartanburg, South Carolina and Asheville, North Carolina. This includes all satellite subscribers in Franklin, Elbert, Hart and Stephens counties. We are truly disenfranchised citizens because of the

flawed and bureaucratic rules of the Federal Communications Commission in Washington, DC.

The rules and regulations of the FCC are extremely bureaucratic, technical, burdensome and a nightmare for laymen and regular citizens. The vice president of customer relations for DirectTV stated no change could be made because of the FCC rules and regulations and their basis in the Neilson ratings. Congressmen Paul Broun and Doug Collins have had no influence at all with the FCC rules that make us orphaned counties. The FCC seems impervious to common sense and common people.

The only promise of gaining access to our home state news, opinion, and emergency information is through the petition upon which Franklin, Elbert, Hart, and Stephens counties are working. The petition is difficult to put together and tenuous in its outcome.

No Federal agency should have the power to disenfranchise citizens. No Federal agency should have the power to segment satellite subscribers in four Georgia counties from a television broadcast in their own state.

Do everything possible to right the wrong. It is by FCC design a difficult, uphill battle.

Let us know if there are ways we can assist and fight these onerous Federal regulations!
Sincerely,
Robert & Eleanor Ragsdale
551 Ruckersville Rd
Canon, GA 30520

CEO – Georgia Association of Broadcasters 6 West Druid Hills Drive NE, Suite 330 Atlanta Georgia, 30329

June 5, 2017

RE: Georgia Orphan Counties (Hart, Franklin, Elbert, Stephens) – FCC Market Modification request per STELAR Act of 2014

#### Chief Executive Officer:

This letter is request your organization's support for the upcoming Market Modification request to be submitted to the FCC on behalf of satellite TV viewers in the Georgia counties listed above that currently can not get Georgia "local" TV stations, only get Carolina's stations. Due to the Satellite Television Extension and Localism Reauthorization Act of 2014 (STELAR) there is a process to modify which "local" stations can be requested in "orphan" areas like ours where we do not get "local" stations in the state where we live.

I am a long-time subscriber to DirecTV in Hart County and have many times over the years contacted their customer service department in attempts to get Georgia TV stations without success. All this time it was well known to me and others that there was no technical reason it could not be done. As Hart county borders a large lake some of the lake homes are second homes, many owners from the Atlanta area. It was not uncommon for some of them to put up a satellite dish at the lake and bring one of their Atlanta home satellite receiver boxes to their lake home and get local Atlanta stations without any technical problems.

The reasons that I want to have "Local" Georgia TV stations (WSB -ABC, WAGA-FOX, WXIA-NBC, and WGLC-CBS) has been outlined in the draft Market Modification request – Georgia news, politics, sports, weather (especially on days with serious storm forecast coming from our west as it usually does). Shopping, which it what the "Local" viewer areas were initially based on are not as important today with all the chain stores/restaurants in most metropolitan areas and the increase of internet shopping. It is time to pay more attention to other important considerations for the viewer like the state you live in and all of those associated things that come with it.

It is my hope that our Market Modification request will be approved by the FCC promptly, and as citizens in Georgia we will be able to have the "local" Georgia stations on our satellite TV soon. An important element to the success of our upcoming FCC request is the support of the Georgia "Local" TV stations as well as your organization who represents them.

I urge you to help all the satellite TV customers in our situation by seeking the support of the Georgia TV stations we are requesting as our "local" stations and providing their and your organization's support by letter to Beth Thomas - County Manager, Franklin County who is coordinating our FCC request. Her mailing address is PO Box 159, Carnesville, GA 30521 and her phone number is (706) 918-3121. Her email address is bthomas@franklincountyga.com

I thank you for your time and will appreciate your assistance to this effort which has a lot of support from people like me who's roots are in Georgia, and lived in the Atlanta area before retiring to the lake. If I can help in any additional way please let me know.

Sincerely,

Terry Cannady 1100 Melody Lane Hartwell GA, 30643 (404) 219-2388 – Cell

Copies to:

Joey Dorsey, Hart County Commission Chairman Ricky Carter, Hart County Commission Frankie Teasley, Hart County Commission Beth Thomas, Franklin County Manager Terrell Partain, Hart County Administrator Alan Powell, Georgia House of Representatives Doug Collins, US Congressman — 9<sup>th</sup> District Johnny Isackson, US Senator David Perdue, US Senator

March 29, 2017

Franklin County Board of Commissioners Attn: FCC Petition P.O. Box 159 Carnesville, GA 30521

#### Gentlemen:

Since moving back to Franklin County seven years ago and leaving the city comfort of cable television, we have no real broadcast option but satellite service (DirectTV).

While doing our due diligence, we quickly learned all of our news, election/political coverage, weather, emergency information and public broadcast would come through stations in Greenville and Spartanburg, SC and Ashville, NC. This includes all satellite subscribers in Franklin, Elbert, Hart, and Stephens counties. We are truly disenfranchised citizens because of the flawed and bureaucratic rules of the Federal Communications Commission in Washington, DC.

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Do everything possible to right the wrong. It is by FCC design a difficult, uphill battle.

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Sincerely,

Rest Clean Regald Robert and Eleanor Ragsdale

551 Ruckersville Road Canon, GA30520

March 24, 2017 Dear Dir Re: Franklin county usewing T.V. stateons from s.c. TN.C. (1) First - I can tell who to Vate for in those states. Beorgia of guess when I vote. (2) Second – our weather is changing, it's getting more dangerous every year. S.C. TN.C. becalants weather at S.C. state line. By that time a toundo, high winds, heavy rans, hails, or other langues husle passed. we have been tet hit " now to we become news & Hestory Atlanta har some of the best equipment + weather people. I know I have lived in metro atlante. metro atlante. New that Channell 4 is off the oir we get very little weather on s.c.'s upt supstite from ashille, N.C. ashable, v. c. is high mountains. We are the hells sections. The Weather in very defferent. (3) Thought all Merchandise deles comes from S.C. + U.C. Why should I go to ashville, U.C. to buy when I can go to north Georgia. Rosy + Shirley Brookshire

Joyce Hilliard 237 Shirley Road Bowersville GA 30516

3-09-17

Franklin County Board of Commission Ofth: FCC Petition Po Bot 159 Carnesville, GA 30521

I'm writing to ask for your help with a longstanding issue that I've contacted DISH about before: the refusal of Dish Network LLC to provide those of us in my area with Atlanta local stations. In previous communications the representatives of your company have claimed that they cannot provide subscribers in my area with Atlanta local stations because they are "required by federal law" to provide programming based on my "Designated Market Area".

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I'm not a lawmaker, or a television programmer, but there ought to be a way for those of us on the edge of market areas to choose which DMA we want to belong to. I'm not asking for both SC and GA stations, I just want to be able to choose between Atlanta and Greenville. I hope you can help.

Sincerely,

Jack C pala-C

3-10-17 Dear Commissioners: Oh, to feel like & helong signed tank lane; signed of belongs to me. mostly & feel Duber a South Carolinian. & tude state that I boil my own I want very much to It able to set to soria meno. To know what a arm on with Moreon comment. I think you for your offorts in regard to this matter. bincerely, . idvilin Rål

March 11, 2017

Franklin County Board of Commissioners,

This to confirm we would like to switch from Greenville, D. C. TV market to atlanta.

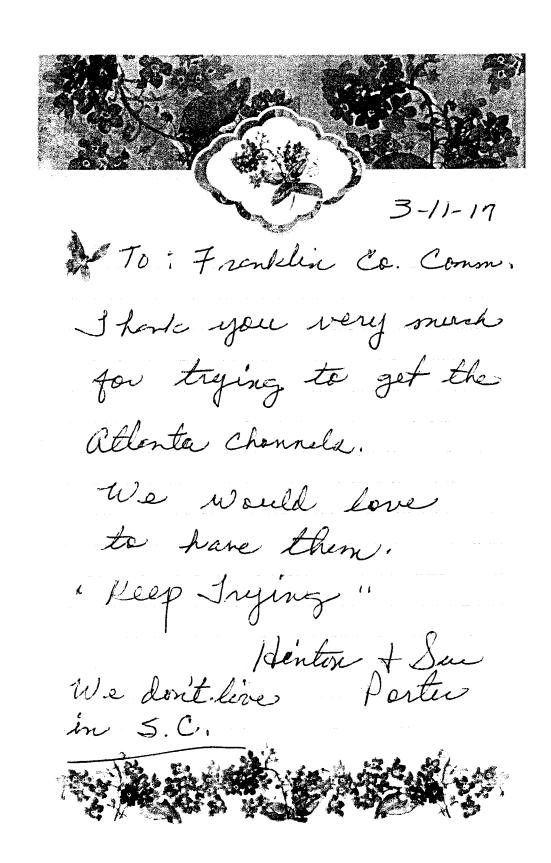
Day L. Elliot

172 Hunters Cresk Fr. Hoccoa, Beorgia 30577 Dear Commissioner,

Atlanta Channels Please!

My name is Circly Jackson and me and My family are requesting a swith from S.C. to Atlanta T.V. Market. We don't Care to know what goes on in South Carolina!

> Thank You, (ind) Jh



Dear Commissioners,

Oly name is Pauline Martin and I would like to request to get Atlanta Channels on my TV, please! I no longer watch any news on my TV because I don't care what goes on in South Carolma.

your truly, Parline Marti

March 15, 2015 Franklin Co. Bd. og Commissioners att. Fec Petition We have been interested in getting the atlanta channels since they were pulled several years ago. Deing in the S. E. and M.C. markets gives us little news about Beorgia We are interested in our state and what goes on at the state levelall we know about &a. Dovernment is nathan Deal is governor, alan Powell, John Wilkinson and Mr. Collins represent The weather forecast is another concernas you know most weather systems and storms come from the west, so we get thom some 80 miles before they get to Greenville -We pray the atlanta stations are returned to us. If not is it feasible we could choose which market we prefer? Mr. Thomas, thatk you for the effort you have put forth in this matter and also to all who have had a hand in this. Frank (Downy) & Juanita Prips on

706-384-4392

Judy Ayers 6275 Stone Bridge Rd Carnesville GA 30521 March 15, 2017

Franklin County Board Of Commissioners Attn: FCC Petition PO BX 159 Carnesville, GA30521

**RE: ATLANTA TV MARKET** 

I REQUEST YOUR ASSISTANCE IN OBTAINING TV COVERAGE FROM THE ATLANTA GEORGIA MARKET.

I have previously written to the FCC and was told I must obtain permission to be released from the NC and the SC TV stations coverage area.

I then wrote to each of the TV stations and was told I was assigned to their advertising market.

I live in Franklin County, Georgia. I cannot learn of Georgia politics, weather, disasters, events, or sports. I do not know any of the politicians who govern our state. I do not have any news from our state. We can no longer receive Atlanta newspapers in our mail box nor can we buy an Atlanta paper in our home town.

I have access to the internet that reaches out into the world. How can I be denied a TV station in my own state! If you prefer, allow us to choose GA, NC, SC, and any other state of choice as our TV station. That would be much more fair.

Sincerely,

Judy Ayers

Franklin County Georgia Resident

6406 Hwy 326

Commerce, Ga. 30530

March 19, 2017

Franklin County Board of Commissioners

P. O. Box 159

Carnesville, Ga., 30521

Attn: FCC Petition

I live on a farm in Franklin County, Georgia, not South Carolina. I do all my shopping in Georgia, not South Carolina. I pay my taxes in Franklin County, Georgia, and the State of Georgia, not South Carolina. I vote in Franklin County, Georgia, not South Carolina. Living on a working farm in

Franklin County, Georgia, not South Carolina, I need the TV stations in Georgia in order to get beef

and crop prices, the weather stations for our area when we need to plow and plant, or bale hay. In order to be an informed voter, I need the Georgia stations to find out who is running for what office, locally and statewide, and their platforms. I cannot get this information from the South Carolina stations.

The FCC, by not allowing us to be in the TV market in Georgia, is putting every person in our county at a terrible disadvantage in more ways than one!

I will appreciate all the help you can give us in getting the FCC to give us the TV market in Georgia -

NOT SOUTH CAROLINA!

Sincerely,

Janet A. Varner

Sanet G. Varner

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